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Red-Winged Blackbirds Scoping Phase

CAT
Content
Analysis
Team

Summary of Public Comment

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801-517-1020



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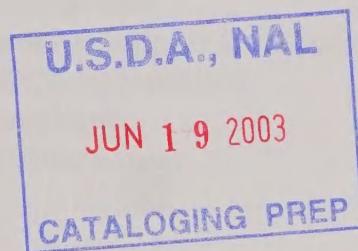




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July 19, 2002

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Chapter 1

Introduction

Purpose and Need for Protection of Sunflowers from Blackbirds

Purpose and Need General

1. Public Concern: APHIS/Wildlife Services should address the true purpose of its involvement in the proposed project.

It strongly appears to me that the purpose and need for the project is not to reduce damage caused by blackbirds. Section E indicates that because blackbirds are protected by the Migratory Bird Treaty Act and the only bird poison registered by the EPA must be applied by the USDA hence, growers can't legally control birds with poison. Thus, the stated purpose and need of the EIS should read: To include APHIS in the project, thereby requiring the Department of Agriculture involvement and control of the project, thereby allowing for the use of an avian poison following the preparation of an EIS/ROD. How strong was the Sunflower growers lobby to congressional districts, and Congress to APHIS to get this project rolling? (Individual, Omaha, NE - #B3-392.5.10000.100)

2. Public Concern: APHIS/Wildlife Services should not justify its proposal as a "scientific experiment."

Calling this bird-killing program a "scientific experiment" does not justify this illogical proposal and is only a ridiculous excuse for its implementation. (Individual, Littleton, CO - #B1-35.4.10100.100)

3. Public Concern: APHIS/Wildlife Services should help growers to understand and manage the problem.

BECAUSE ONLY A SMALL MINORITY OF GROWERS SUFFER CHRONIC, HEAVY LOSSES

A small minority of sunflower growers suffers chronic, heavy losses from blackbirds. I support efforts to help those growers understand and manage the problem that causes heavy blackbird predation. (Individual, Milwaukee, WI - #B3-408.13.20200.903)

4. Public Concern: APHIS/Wildlife Services should find a solution that is fair to all affected parties.

PLEASE, consider this request and that of many birders, and nature lovers. Please strive for a solution that is kind and fair to wildlife, farmers and the consumers of Sunflower products who support wildlife. (Individual, Duluth, MN - #B3-406.10.20000.700)

5. Public Concern: APHIS/Wildlife Services should consider a range-wide approach to blackbird management.

The South Dakota Department of Game, Fish and Parks recommend that APHIS-Wildlife Services consider a range-wide approach to blackbird management, a strategy we have recommended in the past, rather than limit its focus to only one facet of blackbird management. Our resource responsibilities include many wetland species dependent on cattail habitats, wildlife habitats that are sometimes in short supply and are targeted in blackbird roost reduction activities. (South Dakota Department of Game, Fish, and Wildlife, Pierre, SD - #B2-3.6.20300.100)

Implementation of a Program to Protect Sunflowers from Blackbirds

Implementation – General Considerations

6. Public Concern: APHIS/Wildlife Services should not implement a program to protect sunflowers from red-winged blackbirds.

BECAUSE THERE IS NO JUSTIFICATION FOR THE PROGRAM

This decision is egregious and counter productive. There is no justification for it, and you should halt plans to do this now or in the future. (Place-Based Group, New York, NY - #B3-228.1.10000.912)

Nowhere does the proposal indicate that killing millions of blackbirds with poison would lessen the crop damage. The target flock of blackbirds is about 39 million birds. The proposal targets not more than 2 million birds per year. By reducing the flock by 5%, is the damage to the crop reduced by 5% of is it zero because there are still 37 million blackbirds? (Individual, Vancouver, WA - #B1-222.2.10100.602)

BECAUSE HUMAN INTERVENTION CREATES MORE PROBLEMS THAN IT SOLVES

The best blackbird control plan is no plan at all. Wildlife populations are best controlled through natural processes. Human intervention usually creates many more problems than it solves. (Individual, Phoenix, AZ - #B1-21.2.20360.400)

BECAUSE THE FOCUS SHOULD BE ON SOLVING MORE IMPORTANT ISSUES

Why don't you people stop playing god with nature and concentrate on more life threatening issues to human kind such as the pesticides that are being utilized by industries that pollute the water and the earth? (Individual, No Address - #B3-548.2.70000.400)

BECAUSE THE FOCUS SHOULD BE ON CONTROLLING LOSSES CAUSED BY OTHER FACTORS

There is not one solution for this problem, there are a number of steps that should be taken to obtain the final goal of "more profit" for the growers. To this goal I must comment that disease, insects, weeds, and combine equipment cause losses of crops of 21 percent, and the birds an additional two percent. The solution here is to reduce the losses from the major 21 percent sources. These losses must be addressed, and resolved apparently by the U.S. government and with a proper solution here, the bird losses are tolerable without action upon them. I trust that this action will be taken immediately. (Individual, Roseburg, OR - #B3-89.3.25100.909)

If, as is reported, losses to blackbirds average only 1-2 percent of total losses totaling 22-23 percent, than clearly loss mitigation efforts should be directed elsewhere. The proposal seems totally misguided. (Individual, Newark, DE - #B3-432.2.20200.909)

I suggest that the Sunflower Growers of North and South Dakota discuss issues such as:

Considering that "Industry experts estimate an average of about three percent loss during combine harvest" according to your research, I recommend that you determine whether our taxpayer money is better spent developing better combine/harvesting methods. (Individual, Bensalem, PA - #B3-455.7.90500.913)

With figures like these how can you possibly consider acting:

Losses due to disease average six percent nationwide.

Losses due to insects average seven percent nationwide.

Losses due to weeds average five percent nationwide.

Losses due to harvest (combine) average three percent.

Losses due to bird damage (primarily blackbirds) average about 1-2 percent in North Dakota and South Dakota.

The amount of loss is only one to two percent on average. Working to lessen losses from other means would have a much higher impact on the total production than wiping out the birds. (Individual, Edmonton, Canada - #B3-147.2.90500.920)

BECAUSE THE PROGRAM WILL HAVE LIMITED EFFECTIVENESS

This program will undoubtedly have limited effectiveness in reducing crop losses. (Individual, Milwaukee, WI - #B3-341.2.10000.906)

Please reconsider this proposal, as it is extremely flawed and will not meet the stated objective of protecting sunflower crops. (Individual, Perry, MI - #B1-217.5.10100.100)

Implementation – Public Involvement/Support Considerations

7. Public Concern: APHIS/Wildlife Services should not implement a program to protect sunflowers from red-winged blackbirds.

BECAUSE THE GOVERNMENT SHOULD NOT INTERVENE ON THE BEHALF OF FARMERS

As a farmer I feel that I would rather not have the government reducing damage for me in this manner. I think if you can't afford the amount of loss for a particular crop then plant something else. I don't think we should expect the government to kill off anything that causes problems for us. (Business, Clifford, ND - #B3-334.4.10000.906)

BECAUSE TAXPAYERS OPPOSE IT

I believe the premise of this entire environmental impact statement is misguided. The effort of Wildlife Services (WS) start from the assumption that taxpayers across the country should come to the rescue of private businesses producing a cash crop in North and South Dakota. As a taxpayer, I did not ask or hire farmers in North or South Dakota to grow large acreages of sunflowers. I did not promise them a safety net if their decision to grow sunflowers led to losses on their part due to the vicissitudes of nature. It is utterly preposterous to me that these individuals deserve subsidies to prop up their businesses, even if this nation has bailed out farmers of all types (mistakenly) in past years. (Individual, Dover, NH - #B3-429.1.10000.913)

I believe you have a genuine responsibility for all taxpaying Americans to halt this tomfoolery of Government Policy that will only have short-term effects for agriculture, yet long-term detrimental effects for the environment and the wildlife. I hope you will halt this program for the sake of all taxpaying Americans. (Individual, No Address - #B3-219.2.10000.913)

Implementation – Environmental Considerations

8. Public Concern: APHIS/Wildlife Services should implement a program to protect sunflowers from red-winged blackbirds.

BECAUSE RED-WINGED BLACKBIRD POPULATIONS ARE INCREASING YEARLY

Blackbirds are increasing by the thousands each year. Something needs to be done by the USDA. (Business, Dawson, ND - #B3-692.2.10000.417)

BECAUSE THE NUMBERS OF RED-WINGED BLACKBIRDS WILL NOT BE THINNED THROUGH HUNTING

An important tool to combat this very serious production problem is to reduce blackbird numbers. As the population of migrating ducks and geese has increased to alarming numbers in the last several years, so have numbers of blackbirds. Unfortunately, hunters do not consider blackbirds as game birds and so there is no reduction of populations via hunting. (Business, Bismarck, ND - #B1-85.3.25000.800)

BECAUSE RED-WINGED BLACKBIRD OVERPOPULATION IS THE ONLY VARIABLE THAT CAN BE EASILY CONTROLLED

These challenges [too wet, too dry, weed pressure, insect damage, disease] offer very little opportunity to control them. However, the over population of blackbirds is something we can control. (Business, Crookston, MN - #B1-180.2.25000.417)

BECAUSE IT IS NECESSARY FOR THE STABILITY OF THE WILDLIFE ECOSYSTEM

Please consider this action [Damage management of red-winged blackbirds] necessary . . . for the stability of the wildlife ecosystem. (Business, Crookston, MN - #B1-180.3.25000.920)

BECAUSE IF NOTHING IS DONE, GROWERS MAY TAKE ACTIONS THAT ARE NOT ENVIRONMENTALLY FRIENDLY

The serious question is the alternative of 'status quo' or do nothing. . . . The status quo . . . means that farmers continue to take control issues into their own hands. As a last resort to stopping damage, farmers may choose control options that are not environmentally friendly to blackbirds or any other species. The better option is to have the federal government take responsibility for this problem and conduct control programs in an environmentally sound manner. (Business, Bismarck, ND - #B1-85.6.11120.906)

BECAUSE RED-WINGED BLACKBIRDS AFFECT OTHER BIRD SPECIES

Back about 30 years ago there were not that many blackbirds. Now they make it hard to farm and raise any crop not just sunflowers. They also take our songbirds' nests and destroy their eggs and also duck eggs and other species of birds. (Business, Tolna, ND - #B2-655.2.25000.920)

9. Public Concern: APHIS/Wildlife Services should not implement a program to protect sunflowers from red-winged blackbirds.**BECAUSE RED-WINGED BLACKBIRD MIGRATIONS PREDATE SUNFLOWER SEED PRODUCTION**

The past and current projects concerning blackbirds and the sunflower seed crop in North and South Dakota appear to have consumed a sizeable amount of time and efforts by the USDA, APHIS, and Wildlife Services. It is important to face the fact that blackbird migrations have been concerning for thousands of years whereas sunflower seed growing is a relatively recent activity. (Individual, Sunnyvale, CA - #B3-113.1.13100.700)

Since the inception of this research project, far too many years passed without any direct supervision and accountability. This project is not wanted in South Dakota, is not effective in South Dakota, and the concept of bringing a "Silent Spring" to the Couteau de Prairie is unthinkable. (Individual, Sioux Falls, SD - #B1-30.20.10000.425)

BECAUSE OF THE UNFORSEEN DAMAGE IT MAY CREATE

Please consider other means of control for the blackbird population, so you do not inadvertently create more problems that will then take more time and money to undo. (Place-Based Group, Muskegon, MI - #B1-121.3.20200.417)

BECAUSE IT IS ONLY BEING DONE FOR THE SAKE OF HUMANS RATHER THAN NATURE

My overriding concern with managing the blackbird population is that it is being done to meet the needs of man (in particular sunflower growers) rather than nature. (Individual, Saint Paul, MN - #B3-19.6.60000.400)

Implementation – Social Considerations

10. Public Concern: APHIS/Wildlife Services should implement a program to protect sunflowers from red-winged blackbirds.

BECAUSE NON-LETHAL METHODS CAN SCARE RED-WINGED BLACKBIRDS INTO NEIGHBORING FIELDS

A problem of scaring them away is that they just go to a neighbor field, then the neighbor has a problem. (Business, Turtle Lake, ND - #B3-595.2.25200.903)

I used to have fairly good results under the old “harassment” plan. The problem with that was that it just drove the flocks into someone else’s fields. Avitrol did not work at all. I basically began to eliminate sunflowers from my rotation. (Business, Devils Lake, ND - #B3-668.2.25000.417)

Most years I do not have a major problem until other producers chase their birds away and they end up in my fields. (Business, Valley City, ND - #B3-737.1.25100.903)

11. Public Concern: APHIS/Wildlife Services should not implement a program to protect sunflowers from red-winged blackbirds.

BECAUSE RED-WINGED BLACKBIRDS AND FARMERS CAN COEXIST

Blackbirds have been around for many years, as have farmers, and both have co-existed and sunflower crops have been successfully harvested. This issue is not a crisis and farmers need to realize that other interests are involved besides economic ones. (Individual, Glencoe, MO - #B1-163.4.10000.920)

I believe more thinking is what’s needed. Senseless killing is too easy. Just because we CAN do a thing, doesn’t mean we SHOULD. I am totally against this plan and hope it is stopped. I believe we can live in harmony with a few redwing blackbirds. (Individual, Sacramento, CA - #B3-263.2.10200.700)

Implementation – Economic Considerations

12. Public Concern: APHIS/Wildlife Services should implement a program to protect sunflowers from red-winged blackbirds.

IN RETURN FOR STEWARDSHIP OF NORTH DAKOTA’S LANDSCAPE AND ECONOMY

Blackbird management goes far beyond the control of individual producers and available state funding. We ask, on behalf of our family farm members, that effective management and control of proliferate blackbird flocks are developed in return for continued stewardship to North Dakota’s landscape, economy, and vital production of sunflowers for the nation and abroad. (Agriculture Association, Jamestown, ND - #B3-270.7.25000.920)

BECAUSE SUNFLOWERS NEED TO BE PLANTED FOR CROP ROTATION PURPOSES

I have tried everything possible to stop the devastation. Nothing works. Sunflowers have gone from being a profitable crop to one that is a waste of time. We need sunflowers for rotation purposes besides being a profitable crop . . . infested fields run 100 lbs to 450 lbs. versus untouched fields at 1600-2100. (Business, Courtenay, ND - #B3-721.2.25000.602)

BECAUSE FARMERS ARE BEING FORCED TO STOP PLANTING SUNFLOWERS

This year I am forced to eliminate sunflower from my crop rotation because of blackbirds. Until the explosion in the blackbird population, sunflower was the most profitable crop in my rotation. In the past five years losses have ranged from 20 percent to 100 percent in my fields. Over population of blackbirds is the #1 problem on my farm. (Business, Kensal, ND - #B3-661.2.25000.602)

I have raised sunflowers for many years and have always had some problem with blackbirds. In 2001 the blackbirds were worse than ever. I spent many days trying to move the birds out of my fields using various devices. I even asked the local U.S. Wildlife office for help and they told me that I should not raise sunflowers. They were no help at all. I am sure that I lost 30 to 40 percent of the crop to blackbirds. I will not raise sunflowers again. (Business, Kulm, ND - #B3-689.2.25000.903)

Unless something is done to control the blackbirds I will be forced to discontinue raising sunflowers, which is about the only crop I can grow with a chance to make a profit. Let's get this problem solved now. (Business, Jamestown, ND - #B3-660.2.25000.903)

I do not intend to plant any sunflowers in 2002 because of the bird damage. It is getting the best of me trying to keep them out with guns, noisemakers, and shooting. We sprayed Bird Shield on a field four times last year with no result. We have raised them for more than 25 years but the birds finally won. (Business, Lamoure, ND - #B3-703.2.25000.602)

We need ways to control blackbirds both spring and fall. Shotguns and boomer, etc don't do the trick. We are strongly considering no longer raising sunflowers because of the blackbird problem. (Business, Wolford, ND - #B3-732.2.25200.417)

BECAUSE OF THE COSTS THAT FARMERS INCUR AS THEY ATTEMPT TO CHASE RED-WINGED BLACKBIRDS FROM THEIR FIELDS

We shoot through our guns 300 to 400 dollars worth of shells. We put in two to three hours every morning chasing, driving our pickups 1500 to 2000 miles a year. We lost one field of 34 acres completely. Plus losing about seven and one half percent on 500 acres. (Business, Spiritwood, ND - #B3-735.2.25100.903)

Each year I raise sunflowers I spend between three and four thousand dollars to try to protect my crop from blackbirds. The methods I use are shotguns and rifles, boomer guns, four-wheelers to drive to the fields, hiring an airplane to buzz the fields. Even after all I do, I still lose 20 percent to 50 percent of my crop. The numbers of blackbirds must be reduced dramatically so sunflowers remain a viable crop in my rotation. (Business, Webster, ND - #B3-730.2.25000.602)

Since 1993 we've had an explosion in the population of redwing and yellow-headed blackbirds. I've used propane boomers, rifles, shotguns, aerial bombs and harassing with four wheelers through the sunflower fields. A lot of man-hours are lost trying to keep the birds in control. I will not plant any more sunflowers. The blackbirds also damage small grains such as wheat and barley. (Business, Kensal, ND - #B3-682.2.25200.601)

I support Wildlife Services' use of Federal funds authorized by Congress to implement an integrated red-winged blackbird damage management program using non-lethal and lethal techniques.

We have used numerous techniques on blackbirds with very little success. Every fall we spend over 200 man-hours along with over \$5,000 in expenses trying to keep blackbirds out of our unharvested crops. Each morning and evening we spend several hours trying to chase birds out of our fields. This is valuable time that we could use to make money farming instead of chasing birds. Blackbirds are like having thieves come to your farm and not being able to do much more than to scare them out for a while and then they come back and start stealing again.

This last year blackbird caused at least \$20,000 in damage to our sunflowers, corn and small grains in spite of all our efforts to keep them out. (Business, Selby, SD - #B1-135.1.13200.909)

U.S. Department of Agriculture and the Fish and Wildlife Service have done sunflower damage assessments over the years. Estimates of damage vary from year to year depending on the season and the number of acres planted. Estimates of \$10 to 20 million annually are well recognized and have been

reported in journals. What is not reported is the cost of minimizing that damage. In a 1997 survey by North Dakota State University, North Dakota respondents spent "...\$13,129 for shotgun shells, \$5,115 for exploders, \$4,985 for gasoline, \$5,150 for cattail control and 3,198 hours for bird control. If hourly costs are calculated at \$5.75/hr, the cost in time represents \$18,389, and total costs were \$46,768 for all 261 North Dakota respondents." South Dakota and Minnesota respondents' costs were less but still significant. (Business, Bismarck, ND - #B1-85.2.25000.900)

BECAUSE OF THE DAMAGE THAT RED-WINGED BLACKBIRDS DO TO OTHER CROPS

I support Wildlife Services' use of Federal funds authorized by Congress to implement an integrated red-winged blackbird damage management program using non-lethal and lethal techniques.

Our country is full of small lakes, potholes and blackbirds. We had to quit growing sunflowers even though they could be one of our most profitable crops. We have lost up to 25 percent of our corn crop to blackbirds. It is tough to make a profit farming. When you lose up to \$100 per acre from blackbird damage it is impossible. We have to choose our corn hybrids for bird resistance instead of high yields. We estimate that we give up at least 10 bushels per acre because of growing lower yielding hybrids. That's better than losing 30 to 50 bushels to blackbirds. (Individual, Tappen, ND - #B1-133.1.25000.903)

North Dakota Farmers Union supports efforts by APHIS/Wildlife Services program to reduce blackbird depredation to sunflower fields. Every year, North Dakota producers face substantial loss of sunflowers, barley, durum, canola, and other crops to uncontrolled blackbird and common grackle populations. While damage estimates vary, from \$4-7 million annually according to WD calculations, damage levels may be as high as \$10 million. (Agriculture Association, Jamestown, ND - #B3-270.1.25000.900)

Yes the Blackbird problem has put us out of sunflower production. This was a main crop in prior years. Our wheat and barley crops are seeing major losses to bird damage also. Something must be done to contract the bird population. We feel we have enough problems. The blackbird population is totally out of hand. (Business, Lakota, ND - #B3-719.2.25000.601)

We have had hundreds of acres destroyed by the blackbird not only sunflower but also corn. The problem gets worst every year as one million birds grows to three million. We are giving up trying to grow sunflowers because of blackbirds. (Business, Selby, SD - #B3-678.2.25000.601)

BECAUSE OF THE DAMAGE THAT RED-WINGED BLACKBIRDS DO TO RESEARCH TEST PLOTS

As a researcher we have test plots in the Wall, S.D. area. Without proper bagging and caging of plots, we have total crop loss in our Proso millet and sunflowers. Any assistance on your part would be greatly appreciated. (Business, Rapid City, SD - #B3-598.2.25000.601)

BECAUSE OF THE HIGH AMOUNT OF CROP DAMAGE CAUSED BY RED-WINGED BLACKBIRDS

Scientists and farmers have made many attempts to keep crop damage to blackbirds at a minimum. To date the most effective treatments are cattail control (minimizing habitat) and rifle and shotgun harassment. The latter is dangerous to humans and non-target animals. Farmers have already adjusted their production schemes away from wetlands that hold many blackbirds. In multiple cases, farmers have simply dropped sunflower in their rotation to avoid this difficult problem. As farmers reduce their plantings of sunflower, the remaining acres receive more blackbird pressure. In a recent survey (January 2001) of ND and SD sunflower growers, 43 percent of those growers not planting sunflower in 2001 said blackbirds were the main reason for not planting the crop. In a 1997 survey by North Dakota State University, 51 percent of the respondents in North Dakota said blackbirds were 'one of the worst (production) problems' while 36 percent of the South Dakotans surveyed indicated blackbirds were 'one of the worst (production) problems'. In that same survey, 46 percent of ND farmers and 40 percent of SD farmers reported "more than 5% bird damage." Bird damage of 5-10% was reported by 4% of KS, 20% of MN, 26% of ND and 25% of SD respondents. Bird damage of 10-25% was reported by 4% of KS, 9% of MN, 15% of ND and 11% of SD respondents. Bird damage of 25-100% was reported by 4% of KS, 6% of ND and 4% of SD respondents. A greater percentage of respondents in all four states

reported bird damage in the higher loss categories in 1997 than in 1994 (survey). (Business, Bismarck, ND - #B1-85.1.25000.906)

Blackbirds have been and continue to be a very serious threat to the sunflower industry in North Dakota and other states in the Northern Great Plains. Any policy or measure to assist producers in the control of this pest (blackbirds) is direly needed at this time. (Individual, Fargo, ND - #B3-582.1.10000.905)

I am a sunflower grower in south central Dakota and have raised oil sunflower since 1980. In that time I have seen the blackbird problem go from a problem which could be dealt with by field selection, cattail control and hazing to a problem which producers cannot fight with any success. I am also a Mycogen Seed dealer. Mycogen Seeds is the number one sunflower seed company in the nation. I talk with neighbors about their sunflower production and the general consensus is to greatly reduce acres because the birds are damaging them so much. Reports vary from yield losses of 100 pounds per acre to 850 pounds per acre. Their figures come from comparing yields of farmers who say they have no damage. I am not so sure there is a field in this area that has no damage. (Business, Gackle, ND - #B3-457.1.10000.602)

Sunflowers have been an important crop for us, however we have suffered heavy loses in recent years due to blackbirds. We need help in dealing with this problem. If possible I would like to produce sunflower again this year but we cannot start with the damage like we have had the last few years any longer. (Business, Tolstoy, SD - #B3-645.1.10000.903)

I am writing to let you know that blackbirds in Barnes County North Dakota are such a terrible problem that we aren't able to grow them any longer. That's zero acres on our farm this growing season of 2002!! I hope something can be done in the future as sunflowers used to be a good money crop for our farm. (Business, No Address - #B3-639.1.10000.903)

BECAUSE OF THE EFFECT OF SUNFLOWER DAMAGE ON EMPLOYMENT

The serious question is the alternative of 'status quo' or do nothing. If the damage from blackbirds is not reduced, the future of sunflower production in the Prairie Pothole region of the US will be in jeopardy. This has implications for employment in areas where population is in serious decline. Sunflower is processed locally which equates to jobs. (Business, Bismarck, ND - #B1-85.6.11120.906)

13. Public Concern: APHIS/Wildlife Services should not implement a program to protect sunflowers from red-winged blackbirds.

BECAUSE THE EFFECT OF RED-WINGED BLACKBIRDS ON SUNFLOWER CROPS IS MINIMAL

Because Blackbirds cause only 1% - 2% damage, no study should be undertaken at all. The cost of the study will be more than the damage done by the Blackbirds. (Individual, Minneapolis, MN - #B3-20.3.10000.909)

In the Dakotas, barely 1% of the sunflower crop is lost annually. This is not nearly enough to warrant such dramatic and potentially devastating action. (Individual, Melrude, MN - #B3-373.7.10100.909)

BECAUSE OTHER FACTORS CAUSE GREATER LOSS IN SUNFLOWER CROPS

Chiefly stated, my concern is with the Blackbirds and the effects any action taken against them will affect their numbers. The USDA-APHIS-Wildlife Service itself states on page 2 of their report that bird damage (mostly from Blackbirds) causes losses to farmers in the 1-2% range. Weeds cause losses in the 5% range; insects 7% range, combine harvest at 3% and disease about 6%. Although Blackbirds are at the low range of the scale (1%-2%), they are being targeted simply because they can be. The farmers need a scapegoat and they have an easy target—the Blackbird. (Individual, Minneapolis, MN - #B3-20.1.10000.417)

The stated goal is unrealistically low. Is this goal driving WS to the measures stated above? The average losses to other damage variables (insects, disease, weeds, and harvest) are 1-4% higher than losses due to blackbirds. Is the same or greater proportional amount of resources devoted to each of these damage variables as is devoted to the blackbird program? To my knowledge, WS has provided no detailed cost/benefit analysis for this program. With the worth of the entire sunflower industry at close to one billion dollars (more than enough financial resources to make up for the blackbird losses), some improved solutions to this problem can be found. (Individual, Graham, NC - #B3-149.9.10100.909)

BECAUSE OF THE POTENTIAL EFFECTS THAT A RED-WINGED BLACKBIRD NUMBERS MIGHT HAVE ON TOURISM

I've traveled to North Dakota on several occasions as a tourist—I go to see birds. Tourist dollars are the same as agricultural dollars. Please don't ruin one "industry" to rescue some small portion of another. The crop losses are truly minimal when compared to the actual damage to bird populations that certainly will follow baiting with poison and habitat destruction. (Individual, New Ulm, MN - #B3-415.3.25000.700)

Adequacy of Analysis

Adequacy of Scoping Analysis

14. Public Concern: APHIS/Wildlife Services should continue research on the red-winged blackbird issue.

We strongly urge WS to continue research on this important issue. Clarify what blackbird populations are responsible, and when and how depredation occurs. (Individual, Stone Mountain, GA - #B3-389.4.46100.912)

15. Public Concern: APHIS/Wildlife Services should complete thorough analyses and develop conclusions of ongoing programs before initiating new studies.

Over the years the North Dakota Game and Fish Department has attempted to provide biological input on various blackbird management techniques implemented by Wildlife Services and their impact on fish and wildlife resources in North Dakota. These studies have included but not limited to fall research, spring research, late summer research, emergency operational shooting, cattail management, hazing, etc.. The Department supports efforts to reduce damage to sunflowers and/or help producers offset damage. We have been frustrated by Wildlife Services lack of direction and failure to complete thorough analyses and develop conclusions of ongoing programs prior to initiating new studies (see enclosed letter dated January 31, 2000). It doesn't appear anything has changed and our concerns remain the same as expressed in that January 2000 letter. (North Dakota Game and Fish Department, Bismarck, ND - #B2-6.1.10000.102)

16. Public Concern: APHIS/Wildlife Services should study the long-term effects of its proposal to control red-winged blackbirds.

From a very concerned and worried citizen, I ask that you sincerely re-think the idiocy you are contemplating. Do a study, which will include long-range disasters and allow us all to feel a little more confident about the "government" which is supposed to protect our welfare.

I find this action by your office so much more threatening to my well being then I do the blackbirds, or wildlife put here before any of us. (Individual, Toledo, OH - #B1-94.3.40100.103)

17. Public Concern: APHIS/Wildlife Services should study the issues identified for consideration in the EIS.

TO ENSURE APPROPRIATE ATTENTION WITHOUT OVERLY MAGNIFYING CONCERN

We support the study of the issues identified for consideration in the environmental assessment. Those being: the cumulative effect of damage management on the red-winged blackbird population, the efficacy of spring baiting using DRC-1339, and the effect on DRC-1339 spring baiting on biodiversity. We are not optimistic that there can be a study of the "public concern about the use of chemicals," without the concern being overly magnified, but understand the appropriateness of the question. (Agriculture Association, Pierre, SD - #B2-1.3.20100.100)

BECAUSE WILDLIFE SERVICES PLAYS AN IMPORTANT ROLE IN RED-WINGED BLACKBIRD MANAGEMENT

As we believe that Wildlife Services should play an important role in blackbird damage management and especially research, we do not like Alternative 3 although we would be happy to see DRC-1339 discontinued. We feel that all of "the issues proposed for detailed consideration in the EIS" are relevant and should be addressed and debated in detail. (Individual, Folsom, CA - #B3-456.10.20130.100)

18. Public Concern: APHIS/Wildlife Services should justify its extrapolation of four counties to represent all of North and South Dakota.

The EIS should document why the counties of Stutsman, Pierce, Brown and Clark are representative of the depredated sunflower growing regions throughout North Dakota, South Dakota and Minnesota. It appears that APHIS has taken some of the worst-case counties with high depredation rates and made inferences for all sunflower growing areas in these states. This is completely inappropriate given the great variance in cattail-dominated areas in other counties in these states. The \$8.26 million dollar figure used in the public notice may grossly overestimate the impacts based on the four counties used to make extrapolations. (Preservation/Conservation Organization, Rapid City, SD - #B2-8.6.90100.912)

Suggestions for EIS Analysis

19. Public Concern: APHIS/Wildlife Services should prepare an EIS.

We believe that an EIS is needed on the project. We object to the public having to send in 4 copies of a scoping letter and we believe the deadlines for submissions should be the post-mark date of the comment letter, not the reception date of the letter by the agency. Such procedures (for NEPA participation in) are a hindrance to public participation. (Preservation/Conservation Organization, Rapid City, SD - #B1-105.1.12000.102)

We support the decision to develop an Environmental Impact Statement rather than an Environmental Assessment. (United States Fish and Wildlife Service, Denver, CO - #B3-461.9.10100.100)

TO BE IN COMPLIANCE WITH NATIONAL ENVIRONMENTAL POLICY ACT REGULATIONS

Based on CEQ NEPA implementing regulations (40 CFR 1508.27(b)), we believe that APHIS should complete an Environmental Impact Statement (EIS) due to the project's potential for significant impacts. "Significantly" as used in NEPA requires considerations of both context and intensity." Intensity refers to the severity of impact, and the following should be considered: (3) Unique characteristics of the geographic area such as proximity to wetlands or ecologically critical areas. (4) The degree to which the effects on the quality of the human environment are likely to be highly controversial. (5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks. (6) The degree to which the action may establish a precedent for future actions with significant effects. (10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

For APHIS's proposed project, unique geographic features such as prairie pothole and other wetland areas could be adversely impacted by this project. The poisoning of 2 million birds is likely to be a highly controversial proposal to implement. Ecological impacts of the project, conducted over an as-yet-

unknown time period, appear to be highly uncertain. And, this action may establish a precedent for long-term attempts to control red-winged blackbird populations in the Midwest and Great Plains. (United States Environmental Protection Agency, Chicago, IL - #B1-162.4.10100.920)

CEQ's "40 Most Asked Questions" about NEPA states that All relevant, reasonable mitigation measures that could improve the project are to be identified, even if they are outside the jurisdiction of the lead agency, and thus would not be committed as part of the ROD [Records of Decision] of these agencies. Sections 1502.16(h), 1505.2. This will serve to [46 FR 18032] alert agencies or officials who can implement these extra measures, and will encourage them to do so. Because the EIS is the most comprehensive environmental document, it is an ideal vehicle in which to lay out not only the full range of environmental impacts but also the full spectrum of appropriate mitigation. (United States Environmental Protection Agency, Chicago, IL - #B1-162.22.10100.300)

BECAUSE OF THE DAMAGE CAUSED BY RED-WINGED BLACKBIRDS

I personally have been involved in the sunflower business now for 32 years in different capacities: producer, seed sales and now processing.

In those 32 years, one thing has not changed and that is the devastation that has been caused by the blackbird population here in the upper Midwest, including the states of North and South Dakota and Minnesota. This perennial blackbird problem appears to be getting worse, with the ever-increasing size of the migrating population of birds. Because of this situation, many producers have either cut back or quit growing sunflower altogether.

Sunflower has been one of the few bright spots for producers, in North and South Dakota, especially in these times of low small grain prices. However, many growers are finding they cannot physically keep these large flocks away from their fields and are giving up growing the crop.

Because of the above situation, it is imperative that positive measures be taken to help reduce this problem. Thus, I am in favor of the proposal in reference to Docket No.01-013-1 in which an environmental impact study is to be conducted in reducing the red-winged blackbird. (Business, Enderlin, ND - #B1-1.1.10100.906)

20. Public Concern: APHIS/Wildlife Services should analyze the cumulative environmental effects, costs, and effectiveness of its proposed action in an EIS.

The following information (including under section I. Issues Proposed for Detailed Consideration on the EIS) must be known before any plan is devised; excluding this information from the planning would be scientifically unsound.

The cumulative impact on populations of target blackbird and non-target species of plants and wildlife (including impacts on Canadian populations of blackbirds). Under the Migratory Bird Convention from:

Direct killing of up to 2 million red-winged Blackbirds form the use of DRC-1339

Direct killing of individuals of non-target species from the use of DRC-1339, including grassland species of birds such as bobolinks.

Indirect losses to blackbird populations from habitat loss due to cattail management using Glyphosate By WS, and other agencies, organizations, and individual sunflower producers.

Indirect losses to non-target species of plant and animal from habitat loss due to cattail management using Glyphosate by WS, and other agencies, organizations, and individual sunflower producers, including species depending on cattail habitat, such as American Bitterns, black terms, Forster's terms, horned grebes, short-eared owls, Virginia and yellow rails, soras, marsh wrens, and swamp sparrows.

Direct killing of Federally and state protected species of plants and wildlife from the use of DRC-1339 and/or glyphosate.

Direct killing of individuals of each species of blackbirds resulting from actions taken by other agencies, organizations, and individual sunflower producers.

Direct killing of individuals on non-target populations of animals and plants resulting from other agencies, organizations, and individual sunflower producers.

Effects on wetland biodiversity from cattail management Glyphosate

Effects on terrestrial biodiversity from reducing populations of blackbirds, including impacts on insect populations

Effects on terrestrial biodiversity from reducing populations of terrestrial non-target plants and animals.

Degree of humaneness of lethal methods for reducing blackbird populations

Cost-effectiveness of Federal, state, organizational, and private actions to reduce economic impacts of blackbird damage on sunflower crops to:

Individual sunflower growers County and State agricultural base

Sunflower industry in North Dakota and South Dakota

Sunflower industry as whole

Potential for and impacts of exotic and nuisance plant species, such as purple loosestrife and reed canary grass, to invade wetlands after treatment with Glyphosate.

Impact of non-herbicidal components of Glyphosate, such as surfactants, on insect populations.

Effects on areas to which blackbirds finding lack of habitat in Glyphosate-treated wetlands might use for alternate roosting sites. (Individual, Grants Pass, OR - #B3-300.4-5.40100.425)

The types of information that you should analyze in the EIS:

1. Actual historical cost of blackbird depredation to growers.

2. Actual cost to taxpayers (including Wildlife Services salary and other overhead) to administer and carry out the program.

3. What scientific studies support how effective eliminating 2 million blackbirds will be in stopping depredation.

4. How many other species (including endangered and threatened) may be poisoned as part of this program.

5. How much the blackbirds and non-targeted species will suffer from the poisoning (i.e., the humaneness of the proposed program).

6. Effectiveness of carrying out poisoning in the spring, when actual depredation occurs in the fall.

7. The positions of all other stakeholders (taxpayers, tribes, conservationists) besides the growers, who have only their narrow economic interests at heart.

8. The economic losses to growers from factors other than blackbirds (i.e., pests, diseases, etc.).

9. The costs and effectiveness of non-lethal control, including reduction of cattail habitat. (Individual, Boise, ID - #B3-299.4.40100.912)

What is the rest of the public saying about killing blackbirds and the potential collateral damage?

What are environmental groups like the Audubon Society (just an example) offering as alternatives to poison and cattail destruction?

Exactly what destructive plants would fill the gap when cattails are gone, and what will it cost to deal with them?

How does that compare to the cost of doing what it takes to provide non-lethal alternatives?

What non-bird species will die as a result of this poison being put into the environment—how many of them are already in trouble?

What will the proposed chemicals do to the quality of air and water?

What will be done to protect them if you go ahead with any of the lethal proposals?

What will it cost to undo any damage to air and water?

Who will pay for cleaning up any such environmental damage?

This world is once. Extinct is forever. Humans are too many in number, and we're costing this planet too much already in terms of water and air pollution and threats to the biodiversity that keeps this planet going. Every attempt must be made to make peace between the growers and the birds in such a way that we destroy NOTHING. (Individual, Davis, CA - #B3-88.5.40100.912)

I don't believe all the variables have been examined. I understand that when Red-winged Blackbirds are nesting they mostly feed their young grasshoppers. What then would the trade off be? What affect would the bait have on other songbirds? Etc.

Losses due to disease average 6% nationwide.

Losses due to insects average 7% nationwide.

Losses due to weeds average 5% nationwide.

Losses during harvest (combine) average 3%.

Losses due to bird damage (primarily blackbirds) average about 1-2% in North Dakota and South Dakota. (Individual, Glendale, AZ - #B3-121.1.40100.912)

Environmental impacts to be studied in the environmental impact statement:

The impact of cattail reduction on other wildlife and wetlands should be studied

The possibility of restoring the cattail wetlands to their original, natural state via the gradual re-introduction of native plants to the cattail wetlands should be studied

The effect of all lethal chemical methods on other wildlife and plants should be studied

The impact of farmers diversifying methods on other wildlife should be studied

The impact of farmers diversifying their crops so that they don't experience significant loss from blackbirds should be studied (Individual, No Address - #B3-454.4.40100.912)

Evaluation of environmental impacts:

Ensure that all impacts on birds, animals, and plants are evaluated for each method considered

Questions to be answered by the Environmental Impact Statement:

Who does this sunflower damage reduction program benefit, other than farmers in North and South Dakota?

How can we preserve all of the birds, animals, plants, and other wildlife that depend on the wetlands of North and South Dakota, and still satisfy the sunflower growers? (Individual, No Address - #B3-454.12.40100.920)

Chapter 2

Process, Planning, Policies, and Laws

Decisionmaking Authority

21. Public Concern: Public wildlife agencies should address wildlife damage.

I thought that we have wildlife agencies to help control nature but I guess most of them would rather get the farmer off the land not the blackbird. (Business, Tolna, ND - #B3-655.3.11120.100)

BECAUSE IT CANNOT BE ADEQUATELY ADDRESSED THROUGH PRIVATE MEANS

Wildlife damage must be addressed by public agencies as it is beyond private means. We feed or harvest deer when they become a problem, how can we do less with blackbirds? (Place-Based Group, Wolsey, SD - #B1-171.2.11130.417)

My farm borders a federal wildlife refuge. The cattail sloughs on the refuge are an ideal nesting and roosting area for blackbirds. We need to work together to help reduce the number of blackbirds that feed on my crops. (Business, Coleharbor, ND - #B3-652.2.25000.405)

22. Public Concern: APHIS/Wildlife Services should exercise leadership on this issue.

Do environmental groups always have to sue the USDA before your various agencies do the jobs they have been entrusted by the American people, and mandated by the Congress, to do? Please take leadership on this issue. (Individual, Pittsburgh, PA - #B3-173.3.11120.107)

Our problems with blackbirds go beyond what any one producer or any individual state can control. It is an issue that Wildlife Services, as a federal agency, must address with a management plan, which would provide for the reduction in the overall population of blackbirds. If the overpopulation of blackbirds is not addressed, sunflower losses will continue to increase. (North Dakota Department of Agriculture, Bismarck, ND - #B1-98.4.11120.906)

23. Public Concern: APHIS/Wildlife Services should not be involved with a sunflower protection program.

Wildlife Services should not be involved in any way with a sunflower "protection" program. At best, the USDA should use funds to compensate farmers for losses and/or provide incentives to change crops in specific localities particularly affected by blackbird feeding. It is high time for the USDA, and Wildlife Services specifically, to seek 21st century solutions to "problems" experienced by farmers rather than relying on a Middle Ages mentality of killing and poisoning innocent animals. (Individual, St. Paul, MN - #B1-119.6.11120.920)

24. Public Concern: The USDA should consider eliminating APHIS.

BECAUSE TAXPAYERS OPPOSE FUNDING FOR THIS PROJECT

Isn't it possible, in this time of National need, that the US Dept of Agriculture could eliminate APHIS! Our tax money has higher priorities at this time —and kill innocent birds on a wide scale to please a few farmers who raise sunflower seeds (which we also purchase) is not the way we want our money to be spent. (Individual, Columbia, MO - #B3-227.4.13100.913)

25. Public Concern: APHIS/Wildlife Services should abide by the wishes of all U.S. Citizens.**NOT JUST THE RESIDENTS OF NORTH AND SOUTH DAKOTA**

I believe that citizens should have sovereignty over wildlife affairs in their own state. However, as a federally protected migratory species, Redwing Blackbirds do not belong to North and South Dakota, they belong to all U.S. (and Canadian) citizens. As a resident of the Mississippi flyway and an advocate for all species of native wild birds, I would not like to see birds belonging to all Americans be killed even under the auspices of "assisting" a few American farmers. (Individual, Saint Louis, MO - #B3-115.2.30307.700)

Public Involvement

Adequacy/Availability of Information

26. Public Concern: APHIS/Wildlife Services should provide additional information on the plan to poison red-winged blackbirds.

The public will better understand your blackbird poisoning operations and activities if they understand its cost, its effectiveness, and its affect on other wildlife. (Individual, Sioux Falls, SD - #B1-30.11.12200.108)

BY PROVIDING DETAILS ON HOW THE PLAN WILL BE EXECUTED

All protocols for carrying out the proposed activities should be discussed in the Document to provide interested parties an opportunity to thoroughly assess any affects of APHIS' proposed actions. These protocols should include, but not be limited to; bait application, method for estimating RWBB mortalities, pre-baiting methods, methods that will be used to monitor for target and non-target use of bait sites, activities to be performed when non-targets are observed using and/or feeding in bait sites, determining efficacy of the program in regards to decreased blackbird populations and reduced sunflower damage, and pesticide label requirements. (United States Fish and Wildlife Service, Denver, CO - #B1-161.6.12200.111)

27. Public Concern: APHIS/Wildlife Services should clarify information given to the Canadian Province managers.

From the information that I have gathered I discovered that the birds being poisoned in the spring are mainly those pushing northward towards the Canadian Provinces. The Canadian Provinces were not contacted on the whole and were given information, which was not totally true. For example, once Province managers understood that Yellow Headed Black Birds would be impacted they became very concerned about the misinformation supplied by APHIS. Further, information supplied by the Canadian Breeding Bird Surveys indicate that generally the numbers of Red Winged Birds is on the rise and not on the decline even during the periods of poisoning. (Individual, Sioux Falls, SD - #B1-30.15.12200.418)

Public Comment

28. Public Concern: APHIS/Wildlife Services should review previous public comment on this plan.

Please review an April 23, 2001 letter from USFWS Regional Director John A. Blankenship to APHIS on this proposal, as well as that of November 5, 2001, to Secretary Veneman from the American Bird Conservancy. (Individual, Bozeman, MT - #B3-498.2.12300.100)

Please strongly consider the suggestions of Ted Williams in Audubon magazine where I first learned of this awful expenditure of taxpayer money. (Individual, Bensalem, PA - #B3-455.2.12300.913)

29. Public Concern: APHIS/Wildlife Services should respond to comments made by the public.

I have attached previous correspondence from myself that have raised issues during either public comment periods on DRC-1339 issues. APHIS has not responded to concerns I have raised in the past and this lack of response has caused me to believe that APHIS at the State and Regional levels has not taken my previous NEPA comments seriously. Since this NEPA effort now seems to be coordinated by Washington APHIS, I continue to be interested in responses to my concerns. (Individual, Sioux Falls, SD - #B1-30.9.12300.104)

30. Public Concern: APHIS/Wildlife Services should identify and solicit comment from interested international parties.**FROM INTERESTED CANADIAN PARTIES**

International concerns should be addressed in the Document. Based on dispersal studies, the majority of targeted male RWBB breed in Canada, and are not the "problem birds" breeding in the Dakotas. Interested parties in Canada need to be identified and solicited for their comments. (United States Fish and Wildlife Service, Denver, CO - #B1-161.8.12200.418)

Contact, coordination and responsiveness should occur with the Canadian government including the Provinces that might be affected by the removal of large numbers of migratory birds proposed by an operational spring baiting program in the Dakotas. (Individual, Sioux Falls, SD - #B1-30.7.12200.418)

When I questioned Canadian Provincial Wildlife Managers it was discovered that the USDA had not fully or accurately disclosed the effects of the poison on migrating Yellow-Headed Blackbirds and birds in general. Some Provincial Wildlife Managers may not have been asked by the USDA for permission to poison birds migrating to Canada, at all. Since previous APHIS research indicates that the majority of blackbirds targeted by Dakotas spring poisoning campaigns have been heading to Canada to breed, it is important that APHIS contact Canadian Officials for their concerns about a massive poisoning effort directed at Canadian birds. (Individual, Sioux Falls, SD - #B1-30.4.12200.418)

31. Public Concern: APHIS/Wildlife Services should disregard comments from certain groups.**BECAUSE THEIR RESPONSES ARE BASED ON FALSE INFORMATION**

I am trying to balance the organized flood of mail from PETA supporters that you are undoubtedly getting in regard to the upcoming blackbird control program. I understand that the complexity of the problem is far deeper than a simple . . . don't kill the poor blackbirds . . . response.

It is regrettable that this flock of birds has ballooned to this outrageous number. But with an ample food supply, and under-supported natural predators . . . the balance of nature is disturbed. I understand that you are trying to return this balance, and I'm sure you have explored many different solutions before arriving at this current one.

Please disregard ALL PETA based mail you receive as they often use misinformation, or totally false information, to base all of their action alerts on. Plus there is no "balance of reason" website where people like myself can go to organize letter writing campaigns of our own. So here is one lone voice. Keep up the good work. (Individual, No Address - #B3-36.1.11210.105)

Public Meetings

32. Public Concern: APHIS/Wildlife Services should conduct public hearings and meetings as provided by National Environmental Policy Act regulations.

IN BISMARCK, NORTH DAKOTA

I am requesting that public hearings and meetings, as provided by NEPA regulations, be conducted as part of this scoping process. Bismarck should be on the list of sites for a public scoping hearing/meeting. (Individual, Bismarck, ND - #B2-5.7.12300.300)

IN SOUTH DAKOTA

We are requesting that public hearings and meetings, as provided by NEPA regulations, be conducted throughout the state of SD as part of this scoping process. (Preservation/Conservation Organization, Rapid City, SD - #B2-8.7.12400.100)

Collaboration

33. Public Concern: APHIS/Wildlife Services should collaborate with the U.S. Fish and Wildlife Service.

Executive Order 13186 (signed January 10, 2001), "Responsibilities of Federal Agencies to Protect Migratory Birds," establishes that "migratory birds are of great ecological and economic value to this country and to other countries." Federal agency responsibilities under the EO indicate that each "agency taking actions that have, or are likely to have, a measurable negative effect on migratory bird populations is directed to develop and implement, within two years, a Memorandum of Understanding (MOU)" with the U.S. Fish and Wildlife Service (USFWS) "that shall promote the conservation of migratory bird populations." Also, agencies must provide notice to USFWS in advance of conducting an action that is intended to take migratory birds or report on the number of birds taken. APHIS should describe where it is in the MOU process in the EIS, and should coordinate as appropriate with the USFWS. (United States Environmental Protection Agency, Chicago, IL - #B1-162.16.11130.414)

TO ADDRESS INTERNATIONAL MIGRATORY BIRD ISSUES WITH THE CANADIAN WILDLIFE SERVICE

Normally the Canadian Wildlife Service (CWS) addresses international migratory bird issues with the United States Fish and Wildlife and Ecosystem Conservation and Management, which deals with the consultation on migratory birds that is provided for under the terms of the Migratory Birds Convention (MBC). That committee has not been part of the process leading to this proposal, so it is appropriate that CWS comment directly.

While blackbirds are not included in the list of species protected under the MBC, they are important components of the Canadian avifauna and therefore of interest to the Canadian government, and to the provincial and territorial governments who have management authority for the species. Your proposal does not refer to the interests and jurisdictions of Canadians who would be affected by the killing of large numbers of birds that breed and migrate in their areas. Since there has been no formal consultation on this within Canada I can give no assurance that the provincial and territorial governments in authority would support the killing of these shared species. If you choose to rectify this, I suggest you work through the United States Fish and Wildlife Service who could discuss the matter with CWS through normal channels. (Canadian Wildlife Service, Ottawa, Canada - #B2-7.1.12200.108)

34. Public Concern: APHIS/Wildlife Services should indicate in the EIS what international coordination has occurred with Canadian sunflower growers.

Since most of the birds to be removed by a lethal control program are likely to breed in Canada, it would be important for the EIS to show any international coordination that has occurred with Canada, which is likely to be impacted the greatest by this proposed program. (Preservation/Conservation Organization, Rapid City, SD - #B2-8.4.30100.112)

35. Public Concern: APHIS/Wildlife Services should collaborate with non-U.S. Department of Agriculture wildlife and agriculture researchers.**TO DEVELOP NON-LETHAL METHODS TO CONTROL RED-WINGED BLACKBIRD POPULATIONS**

Continue to collaborate in an interdisciplinary effort with non-USDA wildlife and agriculture researchers to improve non-toxic management techniques and investigate the use of integrated pest management mapping techniques as applicable to the blackbird problem to evaluate planting options. (Individual, Milwaukee, WI - #B3-408.20.20200.400)

36. Public Concern: APHIS/Wildlife Services should encourage collaboration between the U.S. Department of Agriculture, growers, and animal rights groups.

A more feasible solution would be for the farmers to work with the U.S. Department of Agriculture and animal rights groups to devise the best, non-lethal, humane way of handling the blackbird problem. (Individual, Rocky Mount, NC - #B1-101.2.11200.920)

37. Public Concern: APHIS/Wildlife Services should encourage North and South Dakota sunflower growers to develop a communication network.

It appears that the Sunflower Growers of North and South Dakota are fairly well networked, if not, perhaps you could suggest that they do Network, so that they could communicate with each other. (Individual, Bensalem, PA - #B3-455.4.20200.906)

38. Public Concern: APHIS/Wildlife Services should discontinue involvement with groups from whom it has accepted funding.**IN ORDER TO MAINTAIN ITS OBJECTIVITY**

Wildlife Services has accepted funding from the South Dakota Oilseed Council. This financial support from the sunflower industry is a conflict of interest for Wildlife Services. Under these circumstances, the public cannot be assured that decisions from Wildlife Services relating to sunflower damage by blackbirds could be made in an unbiased manner. For this reason, Wildlife Services should discontinue its involvement in this controversial program. (Individual, Phoenix, AZ - #B3-86.7.11200.104)

Agency Organization and Funding

39. Public Concern: APHIS/Wildlife Services should procure additional funding and develop a long-term administrative vision.**IN ORDER TO EFFECTIVELY MANAGE THE ENVIRONMENT**

As a research scientist and citizen of the U.S., I am concerned that government agencies, due to lack of funding and administrative vision, are limited in their ability to collect useful data and therefore encounter obstacles in achieving a long-term, viable stewardship of our natural resources. (Individual, Milwaukee, WI - #B3-408.12.13200.912)

40. Public Concern: APHIS/Wildlife Services should provide an exact total of expenses incurred thus far on the project to poison red-winged blackbirds.

We request that APHIS and its supervisory agency provide us with an exact total of all expenses incurred thus far in the project in the Northern U.S. as well as the Southern U.S. Include expenses incurred under the heading of research, as well as active black bird poisoning projects. (Individual, Sioux Falls, SD - #B1-30.18.13200.913)

41. Public Concern: APHIS/Wildlife Services should encourage the birdseed industry to fund a solution to the red-winged blackbird problem.

This past year, we fed around 1,500 lbs. Of sunflower seed to flocks of Pinion Jays, Band-tailed Pigeons, Pine Siskins, and Evening Grosbeaks, just to name a few. The birdseed industry made around \$400 million this past year. Surely they can spend some of their money on solving these problems. Many people who feed birds will have to consider whether they want to support an industry that promotes bird feeding, but also is responsible for the deaths of millions of birds. It also makes us responsible. (Individual, No Address - #B3-544.4.20360.900)

42. Public Concern: APHIS/Wildlife Services should encourage sunflower growers to fund research in alternative crop planning at both North and South Dakota Universities.**WITH THE MONEY PROJECTED TO BE SPENT ON BLACKBIRD CONTROL OVER THE NEXT FIVE YEARS**

Suggest that Sunflower Growers of North and South Dakota discuss issues such as: Consider the amount of money that has been projected the next 5 years for "Blackbird Control," based on the past 5 years, and spend that money in both North and South Dakota Universities for research into alternatives crop and an alternative crop plan aimed at reducing Sunflower Crop Loss." (Individual, Bensalem, PA - #B3-455.6.20200.902)

43. Public Concern: APHIS/Wildlife Services should not pay for the poisoning of Canadian bird populations.

We are concerned about the fiscally wasteful aspects of this project. APHIS is apparently having great difficulty finding the black birds much less any corollary poisoned subjects. To find a sufficient number to prove the success of the project either way would probably reach the millions if it has not already done so. The U.S. Government should not be paying for poisoning of Canadian birds. I think the Canadians would agree anyway. (Individual, Sioux Falls, SD - #B1-30.18.13200.913)

Relationship to Laws, Regulations, and Policies

44. Public Concern: APHIS/Wildlife Services should comply with federal laws.

The dept. of agriculture needs to abide by federal laws just like the rest of us, and federal laws protect these birds. (Individual, Shelburne, VT - #B3-222.2.30300.417)

45. Public Concern: APHIS/Wildlife Services should use legal resources to assist sunflower growers.

I am a sunflower producer. Blackbirds can be a horrible production problem. As a producer, I have very few legal options to protect my crop when huge flocks decide to make my field their dinner. USDA needs to do everything that is legal to assist me and other farmers from these devastating losses. (Business, Onida, SD - #B3-596.1.25000.903)

Chapter 3

Alternatives

Range of Alternatives

46. Public Concern: APHIS/Wildlife Services should propose an adequate range of alternatives.

The limited number of proposed alternatives to be considered in detail in the EIS appears to be shortsighted, limited in scope, and therefore unable to fully address possible solutions to providing assistance to producers experiencing crop damage greater than five percent. (Preservation/Conservation Organization, Saint Louis, MO - #B3-465.8.20200.100)

WHICH OFFER A WIDE RANGE OF MANAGEMENT OPTIONS

It appears that alternative 2 has been preselected, as Alternatives 1 and 2 are very similar, and Alternative 1 is the baseline. Thus, there are about 1.5 Alternatives proposed to be explored in the EIS. I don't believe a full range of reasonable/viable alternatives has been explored to the fullest as proposed. Therefore, other alternatives should be evaluated in terms of environmental impacts. An integrated pest management technique that includes a blend of the following methods to reduce damage to sunflower crops: increased control of diseases, reducing harvesting damage, increased insect and weed control, physical barriers, crop rotation, aerial hazing scare tactics, and cattail control without the use of bird poisons. This, in concert with other control methods could alleviate the need to use bird baiting/poison. Is it feasible to change the timing of harvest so it does not coincide with the peak migration of red-winged blackbirds and other birds to reduce damage? (Individual, Omaha, NE - #B3-392.16.20200.425)

WHICH PROMOTE HABITAT PRESERVATION AND BIODIVERSITY

The outcome of the Environmental Impact Statement should be a USDA recommendation for a package of alternative strategies which do not involve the use of pesticide, poison or herbicide, do not involve the poisoning of legally protected blackbirds and other bird species, do not involve habitat destruction, but which instead promoted habitat preservation and biodiversity. (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.24.20200.100)

Specific Alternatives

47. Public Concern: APHIS/Wildlife Services should include Alternatives 1, 2, and 5 in an EIS.

TO MAINTAIN TRUST AND INTEGRITY

Alternatives 1, 2 and 5 should be included in an EIS. If they are not, then a fair-minded EIS cannot be produced. The fact that they are proposed for exclusion indicates to any reasonable citizen or scientist that the deck is stacked. Apparently, it has already been determined that lethal control of blackbirds will be escalated. (Individual, Iron River, MI - #B3-112.10.20300.103)

48. Public Concern: APHIS/Wildlife Services should not implement Alternative 1.

Alternative 1, to continue current methods of control, employing both lethal and non-lethal means, is unacceptable. (Preservation/Conservation Organization, West Covina, CA - #B3-296.1.20110.920)

49. Public Concern: APHIS/Wildlife Services should not implement Alternative 2.

Alternative 2 is worse—more of the same bad ideas, more of the same mismanagement. (Individual, Langley AFB, VA - #B3-90.6.20120.103)

BECAUSE IT WILL BE INEFFECTIVE

The proposed “Integrated Adaptive Management Program” which proposes to destroy ten million blackbirds over five years is a bad plan and will not accomplish the intended results. (Individual, Saint Louis, MO - #B3-115.1.20120.100)

50. Public Concern: APHIS/Wildlife Services should implement Alternative 3.

Alternative 3 minimizes the damage, and is my preference. (Individual, Langley AFB, VA - #B3-90.7.20130.900)

Unfortunately, the only alternative that I could possibly live with would be that of allowing the states of North Dakota and South Dakota to live with their problem without the assistance of the Wildlife Services’ lethal means to protect the sunflower crop. (Individual, Seattle, WA - #B3-103.4.20130.100)

I would ask you to consider the implementation of Alternative 3 (Implement Current State, Private, and sunflower Producer Damage Management Actions, with no Wildlife Service killing Blackbirds by the millions. (Individual, Edgerton, WI - #B3-371.4.20130.417)

BECAUSE IT FOCUSES ON OTHER FACTORS RESPONSIBLE FOR GREATER LOSSES

I would like you to consider the “no-treatment” alternative and the alternative of focusing energies on crop diversification or at least weeds, insects and diseases that are responsible for greater losses. (Individual, Crystal, MN - #B3-14.4.20000.425)

BECAUSE IT MINIMIZES INVOLVEMENT OF WILDLIFE SERVICES

On behalf of the World Society for the Protection of Animals and our 400,000 supporters, I am writing to request that the Wildlife Services Program select Alternative 3 in your scoping document 01-013-3 that would essentially extract that department from any further plans to poison blackbirds in North and South Dakota. (Preservation/Conservation Organization, Framingham, MA - #B3-276.1.20130.417)

If I must choose one of the alternatives you have recorded for detailed evaluation in the EIS, I would prefer Alternative 3, in which Wildlife Services plays no role whatsoever in current or future management of sunflowers in North and South Dakota. (Individual, Dover, NH - #B3-429.5.20130.417)

BECAUSE OTHER AGENCIES ARE BETTER ABLE TO GENERATE NEW SOLUTIONS

I prefer the no Wildlife Services involvement in sunflower protection alternative. I feel that other entities (states department of agriculture, private organizations, etc.) have more promise of generating new solutions to this problem. (Individual, Graham, NC - #B3-149.11.20130.100)

51. Public Concern: APHIS/Wildlife Services should not implement Alternative 3.**BECAUSE IT DEFERS RESPONSIBILITY TO OTHER AGENCIES**

The third alternative of deferring to another agency hardly seems to be a legitimate EIS alternative. If it were then why not include analysis of an alternative that proposes damage payment? This would also be by another agency. (Individual, Iron River, MI - #B3-112.3.20130.100)

BECAUSE IT IS INCONSISTENT

Why is it appropriate to include Alternative 3 that considers the actions of other agencies, but will not consider compensation because it is outside the jurisdiction of APHIS? This is inconsistent, to say the least. (Individual, Iron River, MI - #B3-112.11.20130.100)

Alternatives Not Evaluated in Detail

Adequacy of Analysis

52. Public Concern: APHIS/Wildlife Services should further analyze alternatives not being evaluated in detail.

Two of the alternatives that will not be evaluated in detail (H.1 and H.2) seem to be dismissed hastily when in fact such alternatives deserve further analysis. (Preservation/Conservation Organization, Saint Louis, MO - #B3-465.9.20300.100)

Implementation of Crop Damage Insurance

53. Public Concern: APHIS/Wildlife Services should implement a crop damage insurance program.

IN ORDER TO PROTECT RED-WINGED BLACKBIRDS

While you clearly state that you have no jurisdiction to provide financial compensation or insurance to farmers who lose crops to blackbird damage, this is in my mind the obvious solution since only a small fraction of the farmers are affected and often with disproportionate losses. Your agency should make every effort to press the federal government and the sunflower growers associations to look at insurance policies and financial compensation for eventual crop loss to blackbirds rather than such a heinous plan to destroy birds and the environment. (Individual, Boulder, CO - #B3-109.4.20320.900)

You must work harder on getting adequate insurance for sunflower growers. Your document says that you do not intend to evaluate insurance. Your document also shows many research projects dedicated to understanding landscape and population dynamics. You should consider funding at least one project to look into the insurance problem. (Individual, Madison, WI - #B3-734.6.20310.100)

I know blackbirds are a pest, but, and this is a big BUT, they only "attack" a small percentage of the sunflower fields. Problem is, in the ones they choose to feed in, the blackbirds clean house. I do feel for the farmers who are the victims. But since the fields chosen by the birds vary from year to year, and overall agricultural losses amount to one-two percent it seems to me that crop insurance would be a logical answer to the problem. (Individual, No Address - #B3-165.2.20310.903)

A possible alternative to consider is development of a crop insurance program to insure against damage to sunflower from blackbirds. Since the majority of damage occurs to producers in predictable locales, an insurance program could target both the problem area and producers experiencing consistent losses. (United States Fish and Wildlife Service, Denver, CO - #B3-461.19.20310.906)

The individual farmers whose crops are devastated by blackbird damage should be compensated by insurance. (Individual, Melrude, MN - #B3-373.8.20200.903)

This last year blackbirds caused at least \$20,000 in damage to our sunflowers, corn and small grains in spite of all our efforts to keep them out. We can insure our crops for almost any kind of disaster except bird damage. Unless you can come up with an insurance policy to cover our losses from bird damage,

we ask that you give Wildlife Services the tools to help us protect our crops. (Business, Selby, SD - #B1-135.2.20310.903)

IN CONCERT WITH NON-NATIVE CATTAIL REDUCTION

Alternative H.1 (crop damage insurance) holds tremendous potential, and even the scoping document indicates that the National Sunflower Association continues its attempts to improve crop insurance coverage for producers. Such an improved program could be patterned after a program being developed in Venezuela (which is experiencing rice/sorghum depredation by dickcissels) in which the farmers' co-op, with the support of government and nongovernmental organization would compensate farmers who suffer major losses. Such a system would probably be far more cost-effective than trying to affect population control on superabundant blackbirds, especially if it is combined with aggressive non-native cattail reduction. (Preservation/Conservation Organization, Saint Louis, MO - #B3-465.10.20310.906)

FOR GROWERS EXPERIENCING MORE THAN TWO PERCENT CROP DAMAGE

Since the Notice indicates that overall damage is one-two percent of the sunflower crop, and this is said to be a tolerable level, APHIS should consider an insurance or compensation program for highly affected growers (for which more than 2 percent of the crop is affected) in place of bird control. In the long run, such a program might be much less expensive and would certainly be less damaging to the environment. (United States Environmental Protection Agency, Chicago, IL - #B1-162.10.20320.900)

FOR GROWERS WILLING TO DIVERSIFY CROPS

If the losses are \$0.5-5 million or 0.25 percent to 2.5 percent and if selecting appropriate crops could reduce this even more say to \$0.5 to 4 million or 0.25 percent to two percent then I think it would be very reasonable to think that a balance could be worked out where the Governments of the affected states would pay a portion—say two million—and the farmers would pay zero to at most two million (zero to one percent of their net) a year to set-up an insurance coverage for all farms. (Individual, Fountain City, WI - #B3-333.3.20310.906)

FOR GROWERS EXPERIENCING CONSISTENT AND SEVERE LOSSES

A possible alternative to consider is development of a crop insurance program to insure against damage to sunflower from blackbirds. Since the majority of damage occurs to producers in predictable locales, an insurance program could target both the problem area and producers experiencing consistent losses. (United States Fish and Wildlife Service, Denver, CO - #B1-161.10.20310.903)

For sunflower growers experiencing heavy losses, we suggest that the USDA, in cooperation with the states of North and South Dakota, examine the possibility of starting a compensation or special insurance fund for landowners whose sunflower crop suffers severe losses. (Preservation/Conservation Organization, Washington, DC - #B3-153.10.20310.903)

BECAUSE IT IS NOT THE RESPONSIBILITY OF THE GOVERNMENT

I vote for private insurance . . . alternatively, if all sunflower growers want to issue insurance, let them take care of it as a sunflower grower association. It's not the government's job to kill birds, especially in a futile attempt to keep them from eating. (Individual, Langley AFB, VA - #B3-90.3.20310.906)

I agree that insurance held by these farmers via the National Sunflowers Association is the proper source of help for farmers. (Individual, Oakland, CA - #B3-440.4.20310.906)

BECAUSE THERE IS NO REQUIREMENT THAT ALTERNATIVES BE LIMITED TO ACTIONS CURRENTLY WITHIN THE JURISDICTION OF WILDLIFE SERVICES

The EIS should include a full analysis of a blackbird insurance program. While existing programs may be inadequate or not within the jurisdiction of Wildlife Services, the EIS should examine ways this alternative could be made viable. The insurance program could be modeled on other insurance programs such as hail insurance. There is no requirement that EIS alternatives be limited to actions currently within the jurisdiction of Wildlife Services. (Preservation/Conservation Organization, Washington, DC - #B3-423.3.20310.300)

BY MODIFYING CROP INSURANCE LANGUAGE

My fundamental question remains—does blackbird control even make sense as the most effective way to reduce sunflower damage? Modifying the crop insurance language seems much more reasonable and the costs wouldn't all be carried by taxpayers. (Individual, Crystal, MN - #B3-14.10.20310.913)

BY INSTITUTING SHARED INSURANCE COVERAGE

I would like to greatly encourage you to consider instituting shared insurance coverage for the sunflower crop and forego killing the red-winged blackbirds. (Individual, Fountain City, WI - #B3-333.1.20310.417)

WITH FUNDING FROM PRIVATE SOURCES

We also urge establishment of crop-damage insurance and financial compensation for farmers most heavily impacted. Please investigate potential for private funding sources to assist in this latter program. (Individual, Stone Mountain, GA - #B3-389.7.20320.903)

WITH CONTINUED RESEARCH AND OPERATIONAL ASSISTANCE FUNDED BY NON-GOVERNMENTAL AND GOVERNMENTAL ENTITIES

Crop insurance/compensation must be the major focus of the blackbird sunflower program, with a minor focus on continued research and operational assistance; this insurance/compensation could be funded by nongovernmental and governmental entities. Venezuela could prove to be an important model of an improved system. (Individual, Graham, NC - #B3-149.10.20300.903)

VIA THE NATIONAL SUNFLOWER ASSOCIATION

Individual farmers that sustain loss could be compensated for their loss by insurance via the National Sunflower Association. (Individual, Duluth, MN - #B3-406.7.20320.903)

54. Public Concern: APHIS/Wildlife Services should implement Alternative 3.**BECAUSE THE BEST SOLUTION INVOLVES CROP INSURANCE OR SOME OTHER MEANS OF LOSS SHARING, AND THIS IS NOT WITHIN THE SCOPE OF WILDLIFE SERVICES**

The “preferred alternative” in the EIS should be to Implement Current State, Private, and Sunflower Producer Damage Management Actions, with no Wildlife Services Programs. Killing individual blackbirds will accomplish nothing since the remaining birds will continue to cause uneven damage to crops. The solution to this problem involves crop insurance or some other means of sharing losses among all farmers. Since this is not within the scope of Wildlife Services, the “No Wildlife Services Programs” option is most appropriate. (Individual, Phoenix, AZ - #B3-86.2.20110.100)

Financial Compensation for Economic Losses

55. Public Concern: APHIS/Wildlife Services should compensate sunflower growers for their losses.

There are programs in place under USDA to compensate farmers for crop losses and damages. These are the techniques that should be employed, not killing of migratory birds. (Individual, Iron River, MI - #B1-165.2.20320.414)

I would like to state that barely one percent of the annual sunflower crop has been shown to be lost to consumption by birds. It seems that it would be wiser to compensate farmers for their losses than to make everyone else suffer the losses brought about by this type of poisoning. (Individual, Blanchardville, WI - #B3-374.3.20320.906)

The scoping document states one of the alternatives that will not be considered in detail in the EIS is financial compensation to farmers for losses. I find it interesting that compensation would cost less than one percent of the total sunflower industry's value un North and South Dakota (based on your estimate of \$3.7 million of losses annually within an industry worth \$906 million across both states, according to

your estimates), yet these farmers and Wildlife Services are willing to sacrifice five percent of the red-winged blackbird population (two out of an estimated 39 million) in the region in the name of protecting the sunflower crop. Why is less than one percent of financial loss worth more than five percent of the red-winged blackbird population? Surely these birds have a right to live as much or more than the "rights" of farmers to recover such small amounts of financial loss. (Individual, Dover, NH - #B3-429.3.20320.900)

Please consider an alternative of compensating farmers with dollars instead of poisoning blackbirds. Please discuss a range of compensation factors—how much damage must a farmer experience before he receives some compensation for damages. (Preservation/Conservation Organization, Rapid City, SD - #B1-105.6.20320.903)

BECAUSE IT IS COST EFFECTIVE

Birds and crops have co-existed for centuries. Why can't that continue to be the case in the 21st century? Shouldn't we be able to come up with smarter solutions than killing birds and destroying wetlands? Financial subsidies would be preferable. In both the long and the short run, financial subsidies are probably cheaper than poisoned bait and herbicide-sprayed wetlands. In addition, financial subsidies would not require all the expensive studies, all the poison, all the herbicide, all the equipment, all the consultants, and all the personnel that the current policy needs. And financial subsidies would be environmentally friendly. (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.24.20200.100)

Alternative H.2 (financial compensation for economic losses) is dismissed because no funds are available for Wildlife Services to compensate producers for damage. In this era of Farm Bill appropriations which encompass billions of dollars to farmer for subsidies, compensations, and creative conservation reserve programs, compensation for sunflower losses estimated at a mere \$1.8 to 3.7 million is not an unreasonable requested addition Farm Bill measures. State and federal legislators from Dakotas should be more aggressive in procuring an equitable portion of federal farm monies available to their constituents in lieu of dismissing this alternative and stating that it's easier just to poison the nuisance birds. It is thought that poisoning would be a less expensive alternative, but again, this is a short-sighted thought in that all economic and environmental implications of such a practice have not been considered. (Preservation/Conservation Organization, Saint Louis, MO - #B3-465.11.20320.417)

COMPENSATE THE GROWERS WHO EXPERIENCE THE MOST EXCESSIVE LOSSES

Similarly financial compensation need not be for all sunflower losses. Rather compensation could be only to those producers who experience the most excessive losses. (Preservation/Conservation Organization, Rapid City, SD - #B3-452.9.20320.903)

IN CONCERT WITH NOISE DEVICES

The loss of sunflowers seed to birds has been estimated at one percent to one percent of the crop. Losses to insects are estimated at seven percent weeds at five percent, harvesting loss at three percent, and disease at six percent. Why not try to help farmers mitigate those losses. Why not pay farmers compensation for blackbird losses? The USDA pays millions to farmers for not planting. Paying for losses from birds would be a sensible alternative, in concert with other efforts such as noise devices. (Individual, Atlanta, GA - #B3-151.5.20320.400)

VIA A SURCHARGE ON SUNFLOWERS SOLD FOR BIRDFEED

The individual farmers whose crops are devastated by blackbird damage should be compensated by insurance, or via a small surcharge placed on sunflowers sold for bird feeding. (Individual, Saint Paul, MN - #B3-405.8.20200.906)

In the Dakotas only about one percent of the sunflower crop is lost to blackbird damage. Instead of killing off millions of birds compensate those farmers actually suffering losses. If need be a small tax on sunflower seeds sold as bird feed would seem to be an appropriate way of funding such an insurance program. (Individual, Olivia, MN - #B3-428.5.20320.602)

The individual farmers, whose crops are decreased by the blackbird damage should be compensated by insurance via the National Sunflower Association, or via a small surcharge placed on the sunflowers sold for bird feeding. Although most of the crop is grown for human consumption, millions of dollars of seeds are sold annually for birdfeed. Those buyers would likely be willing to accept the \$.25 surcharge on a 50lb. bag of seeds. (Individual, Duluth, MN - #B3-407.3.20300.920)

Would birders be willing to pay an additional fee/tax on sunflower seed sales to create a fund to compensate farmers for bird damage to crops? Please consider this alternative. (Preservation/Conservation Organization, Rapid City, SD - #B1-105.15.20320.602)

Payment to the farmers for loss of income is much better than killing birds. A small surcharge on sunflower seeds and oil could easily cover this cost. As a backyard birder who uses lots of sunflower seeds each year, I would be willing to help pay this. (Individual, Oshkosh, WI - #B3-403.2.20320.906)

WITH TAXPAYER DOLLARS

I would be in complete support of my tax dollars paying farmers for sunflowers crops damaged by blackbirds and other migratory birds and wildlife. I will never support the use of my tax dollars for poisoning. (Individual, Perry, MI - #B1-217.3.20320.913)

WITH FUNDS THAT WOULD OTHERWISE BE SPENT ON AERIAL HAZING

The Sunflower Protection Scoping Document says that financial compensation to growers will not be considered as an alternative. Why not? The argument that funds are not available is too thin. By USDA's own estimate, as little as \$1.8 million, plus administrative costs, would be needed. On the other hand, there are apparently ample funds for research on: blackbird migration, the use of DRC-1339, fall and spring baiting, the application of herbicides, the evaluation of lure crops, the use of Avitrol, pop-up scarecrows, and propane cannons. In addition, there are funds available to operate a cattail management program, at no cost to growers! The aerial hazing program flew more than 19,000 hours during the years 1986 through 1994. I flew as a licensed private pilot during the years 1980 through 1989. During the latter part of that period I rented the Cessna 172 from my local Fixed Base Operator at an average rate of \$45 per block hour, fuel included. A simple calculation, based on my personal experience, indicates that perhaps as much as \$855,000 was spent for aerial hazing operations: 19,000 hours x \$45 per hour = \$855,000. I suspect that aircraft larger than the Cessna 172 were used in the hazing program, at a cost greater than \$45 per hour. If so, that would mean more than \$855,000 was spent. Why can't the money spent on aerial hazing be diverted to compensating growers for their losses? (Individual, No Address - #B3-142.14.20320.909)

WITH FUNDS THAT WOULD OTHERWISE BE SPENT KILLING BIRDS

I find it . . . sickening that a government organization would support that kind of an idea. It could just as easily organize a program to reimburse the people who suffer damage with the same money it would spend killing birds. (Individual, No Address - #B3-446.4.20320.903)

WITH FUNDS THAT WOULD BE OTHERWISE BE PAID TO CHEMICAL CORPORATIONS

Instead of giving millions of dollars to chemical corporations, take those millions and pay the farmers for their losses since most insurance companies won't. (Individual, Mendocino, CA - #B3-118.3.20320.903)

UNTIL EFFECTIVE CONTROL MECHANISMS ARE REALIZED

As the largest general farm organization in the state with more than 34,000 family memberships, our producers support a compensation program for crop and suffer significant losses in specific fields should be developed. Such a program would not replace current and future damage management, which is an ongoing need until effective control mechanisms are realized. (Agriculture Association, Jamestown, ND - #B3-270.5.20320.903)

56. Public Concern: APHIS/Wildlife Services should not compensate sunflower growers for their losses.

DUE TO RELATIVELY LOW AVERAGE LOSSES

I am very concerned that the federal government is evaluating the control of blackbirds in order to assist farmers that are growing sunflowers along the natural migratory route of blackbirds. This is similar to assisting homeowners who experience loss of property because they built their home along a geologic fault line, or in a floodplain, or in other high-risk areas. Farming is risky. Deciding to grow row crops along a major flyway, when those crops are a source of food for birds is very risky. That's the cost of doing business gang. Let the market decide the cost of sunflower seed, without government assistance. Besides, the scoping document indicates that "bird damage averages about one-two percent in North Dakota and South Dakota." Two percent, in my mind, is pretty darn low, when most retail markets experience a greater loss due to theft. (Individual, Omaha, NE - #B3-392.1.90320.906)

57. Public Concern: APHIS/Wildlife Services should evaluate grants or loans to farmers.

TO ENCOURAGE CROP DIVERSIFICATION

Please evaluate grants or loans to farmers at risk of excessive damage from blackbirds to provide incentives to them to change to another type of crop. (Preservation/Conservation Organization, Rapid City, SD - #B1-105.12.20320.903)

Eradication of Red-Winged Blackbirds

58. Public Concern: APHIS/Wildlife Services should not attempt to eradicate all red-winged blackbirds.

BECAUSE OF EFFECTS ON THE ECOSYSTEM

I don't think sunflowers need protecting from blackbirds. Every crop has its native predators/pests. While it is desirable to control these pests from a food production standpoint, I don't think you can ever completely eradicate a problem pest without serious ramification to the natural functions of the ecosystem. (Individual, Omaha, NE - #B3-392.11.20330.425)

Reintroduction of Natural Predators, Disease, or Parasites

59. Public Concern: APHIS/Wildlife Services should reintroduce natural predators.

If you truly want to manage this and future problems of this kind, you will work to support the reintroduction of natural predators, as well as "corridors" by which they may travel from habitat to habitat to breed and live. If cougars, coyotes, wolves or bobcats are reintroduced, the number of raccoons, opossums, foxes, skunks and feral cats will decline. Once the number of these smaller egg and bird eating predators has been reduced, the population of songbirds will increase. Once the songbirds have returned, the number of blackbirds will decline, because they will once again be facing competition. Songbirds do not crave sunflowers like the blackbirds do hence the sunflowers are saved! (Individual, Union, NJ - #B1-67.5.20200.414)

Probably the most effective way to reduce the populations of blackbirds, and effectively control them would be with falconry. Kalamazoo International Airport has totally removed the threat of bird damage to aircraft landing and taking off through the use of falconry. The proposal of poisoning is going to create much more damage than benefit. (Individual, Mattawan, MI - #B3-589.2.20200.417)

Will a large die-off of birds in the area increase predation? Can tame predators such as raptors or cats be used to control the populations in special locations? (Preservation/Conservation Organization, Rapid City, SD - #B1-105.13.20340.417)

Predators, such as marsh hawks, could provide natural control. (Individual, Burton, OH - #B3-116.3.20340.100)

I hope instead of lethal methods you'll reintroduce cougars, coyotes, wolves, bobcats, and other predators. (Individual, Abingdon, MD - #B3-7.2.25200.417)

BY IMPROVING PREDATOR HABITAT

If sunflower production is a cause of the blackbird population increase, maybe we should not be trying to grow sunflowers so close to the wetlands in which the red-winged blackbirds roost. If reduction of predators is a cause, we should bring back grasslands that the predators use for habitat. (Individual, Saint Paul, MN - #B3-19.7.20300.100)

Improving habitat for avian predators was not discussed in the EIS. I propose studying whether some acreage of grasslands can be planted and set aside to improve nesting habitat for possible predator species such as hawks, falcons, and owls. Perhaps some nest boxes for avian predators could be installed as well. Nest boxes could be erected on poles or taller structures (if available) such as grain elevators, radio transmitters or microwave towers. (Individual, Saint Paul, MN - #B3-19.4.20340.912)

60. Public Concern: APHIS/Wildlife Services should not reintroduce natural predators.

BECAUSE THE LARGE PREDATORS SUGGESTED FOR REINTRODUCTION DO NOT TARGET MIGRATORY OR NESTING BLACKBIRDS

Alternative 4, postulating reintroduction of cougars, coyotes, wolves, and bobcats is so patently unscientific and silly. What data did APHIS find to indicate that prairie wolves were a primary predator on migratory or nesting blackbirds? I assume that in spite of intensive farming, the Dakotas still have their fair share of snakes, ground squirrels, short-eared owls, grackles, crow, jays, weasels, mink, domestic cats, and foxes that are doing a fine job of depredating blackbird nests and some migrants. Was this alternative included as some sort of silly veiled threat? What is the purpose of such an outrageous suggestion? You could introduce grizzly bears too but it is unlikely to ever have a significant effect on concentrations of migrating blackbirds. There is simply the wrong suite of predators to even consider. Blackbirds are super concentrated in spots in the Dakotas because of a combination of land management practices, not a lack of large predators. (Individual, Iron River, MI - #B3-112.9.20340.100)

Physical Exclusion of Red-Winged Blackbirds From Sunflower Fields

61. Public Concern: APHIS/Wildlife Services should encourage the use of netting.

Re-evaluate the rejected Alternative 5: Physical Exclusion of Blackbirds from Sunflower Fields with Netting or Other Material. The scoping document indicates that this alternative was rejected because physical barriers would be logistically difficult to erect and maintain over 2 million acres in ND/SD and would not be economically cost effective. This seems flawed. First, the document indicates that in ND/SD there are just over two million acres as of 2000 in sunflower production (Page 2, G.1). The document further states that in North Dakota and South Dakota, damage is low; generally one-two percent of total production, and that damage is not equally distributed among all fields. Only three percent of the respondents indicated that their losses were between 25-100 percent. Again, how many acres does this amount to, and wouldn't a physical barrier be effective in many cases? Particularly if

crops are rotated—thus, if not all 2 million acres are in sunflower production at any given time (rotated to corn, wheat, barley, soybeans), and not all acres are heavily impacted by birds, and of those heavily impacted, not all are by cattails, it seems worthwhile to evaluate the potential to use exclusions. How much would it cost? If it reduces the \$4-7 million damage that is currently experienced, then it is effective, and it does so in such a way that is less than what the costs to the government are to prepare this EIS and to implement the various controls, and to monitor methods that kill blackbirds, then perhaps it is effective! Please evaluate fully a physical barrier method. (Individual, Omaha, NE - #B3-392.14.20350.900)

It is this “collateral damage” that must be considered more thoroughly, and more time, effort, and yes, money, diverted to discovering non-lethal methods that put nothing at risk. The exclusion of an alternative to exclude Blackbirds from sunflower fields with netting or other material because it would not be “economically cost-effective” is just plain infuriating. Once we’ve destroyed habitat and species in our rush to protect a cash crop, how much money do you think it will require to carefully coax species back as you know wildlife organizations will do. They will request and lobby for tax dollars; they will sue government agencies; they will beg for donations; they will do everything in their power to prevent these creatures from disappearing from the planet and at great cost! So the sunflower growers will make a profit, and everyone else will pay. (Individual, Davis, CA - #B3-88.2.20350.920)

Are there other ways to keep the sunflowers away from the birds? In Virginia and Costa Rica there are large nurseries under plastic or fine cloth mesh. Would this work in the Dakotas? (Individual, Oakton, VA - #B3-140.5.20200.417)

To poison birds, and endanger other animals—both domestic and wild—is insane. If you are so concerned with sunflower seeds, then protect the plants with nets. Do not use poison! This is the 21st century and the random murder of birds and animals is not acceptable. If the farmers are upset, let them invest in netting, not rely on murder by the U.S. Government. Sometimes, I think everyone in Washington is nuts. It’s too easy to say “kill,” and too much work to find a solution. (Individual, Cave Creek, AZ - #B1-18.3.20200.920)

The growers need to spend money to make money. Let them build or erect netting or other such devices, which will prevent most blackbirds from access to the crops. (Individual, Newtown, PA - #B3-23.3.20350.903)

TO COVER CATTAILS

Wherever possible, cover the cattails within the six to ten mile of crops, using netting this to be implemented only on narrow bands of cattails. (Individual, Roseburg, OR - #B3-89.4.20350.406)

IN CONCERT WITH BREAKING UP CROPS

If huge crops are the reason netting is impractical, then consider breaking up fields with naturally growing plant life that will provide an alternative food source to the birds and harm nothing. Then cover those smaller fields with nets, produce unpleasant noise that makes them leave the territory, get creative, but don’t resort to killing. Of course tactics like this will cost more up front, but it is a worthwhile investment. Since breaking up field size, etc. is not an annual occurrence, surely the money would be recovered over time. This protects sunflowers; this protects the birds. (Individual, Davis, CA - #B3-88.4.20200.920)

62. Public Concern: APHIS/Wildlife Services should encourage the use of fencing.

If people insist on denying nature, then they should invest in fencing and enclose the crops within two miles of blackbird roosts. (Individual, Cave Creek, AZ - #B3-24.3.20350.700)

Chapter 4

Management Prescriptions

Management Prescriptions General

63. Public Concern: APHIS/Wildlife Services should target control measures specifically to birds determined to be crop raiders.

TO PROTECT NON-TARGET SPECIES

Control measures must be specific to birds identified as problem crop raiders only. Mortality of non-pest red-winged blackbirds and non-target species due to a poisoning program is unacceptable (even in trials) since alternative management techniques toward pest birds either already exist or may be further developed to improve effectiveness. (Individual, Milwaukee, WI - #B3-408.5.20200.419)

Another caveat to the whole deal is that studies also show that only a small proportion of the red-winged blackbirds do the crop destruction and these tend to be local birds. Thus it would be better to deal with the problem birds than to indiscriminately target all migrating birds unlucky enough to pass through where the poison grain is. (Individual, No Address - #B3-165.3.20200.425)

64. Public Concern: APHIS/Wildlife Services should consider the cumulative effects of various red-winged blackbird control efforts in other regions.

Please consider the cumulative effects of various redwing - blackbird control efforts in other regions. Please review any other changes in habitat conditions that may happen in other nations/states to which the blackbirds migrate. Please review the cumulative effect on the viability of the species. (Preservation/Conservation Organization, Rapid City, SD - #B1-105.4.46100.912)

65. Public Concern: APHIS/Wildlife Services should discuss the effects of its current policy of poisoning birds and destroying cattail/wetland habitat.

The current policy of poisoning birds and destroying cattail/wetland habitat has been in place for several years. The effect or impact of the current policy should be disclosed and that data should be included in the EIS. What was the blackbird population before the policy was implemented, and what is the population today? How many blackbirds were killed from the poisoned bait? How many other birds and what other species were also killed from the poisoned bait "intended" for blackbirds? How many acres of cattail/wetlands habitat have been destroyed already, and what effect has that habitat alteration/destruction had on the wetlands ecosystem, not only to birds but to all the wildlife and plants in those areas? And most significantly, what reduction of crop loss, if any, has there been as a result of the years of blackbird killing and wetland destruction. (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.19.25000.912)

Cultural Practices

Cultural Practices General

66. Public Concern: APHIS/Wildlife Services should encourage a change in farming techniques.

Continue to invest in the research and development of agricultural techniques and habitat management to disperse flocks using the science of ecology rather than by poison. (Individual, Milwaukee, WI - #B3-408.21.25000.912)

CROP ROTATIONS

Has anyone thought about natural models such as creating a boom/bust cycle of planting particular areas only in particular years (such as every other year or every third year), cycling as do oaks, cicadas and other organisms? Such a system would not allow blackbird populations in any particular area to climb to such huge numbers that they would create the problems that now exist. This would involve cooperation among farmers and finding alternative crops for non-sunflower years, but nature's way is often the best way for solving difficult problems. (Individual, Atlanta, GA - #B3-135.2.25100.417)

I suggest that the Sunflower Growers of North and South Dakota discuss issues such as:

What else can we grow besides sunflowers, and could we as a North/South Dakota network "rotate crops" in such a way, perhaps over a five-year plan, that does not promote North/South Dakota as the preferred flyway for Red Wing Blackbirds, and other native birds. (Individual, Bensalem, PA - #B3-455.5.25100.417)

Please look at the distribution of sunflower fields juxtaposed to wetlands. Could the U.S. Department of Agriculture try to encourage folks who don't live near wetlands to grow sunflowers and folks who leave near wetlands to grow other crops? (Preservation/Conservation Organization, Rapid City, SD - #B1-105.11.25100.903)

Most red-winged blackbird 'damage' to sunflower crops happens in those areas planted closest to the roosting marshes. So stop planting so close to the marshes. Put your brains to work to see what other crops could be planted instead, or simply take the sunflowers totally out of the 3-4 year rotation. The farmer needs to make a living, no argument there, but some agricultural behavior modification is in order, not more killing and poisoning. (Individual, Mendocino, CA - #B3-118.2.20200.920)

CROP DIVERSIFICATION

APHIS could consider encouraging crop diversification and rotating sunflower crops with less or undesirable crops for red-winged blackbirds to reduce crop losses in areas that currently receive the heaviest visitation and damage. This strategy seems especially important for sunflowers since they are a highly desirable high-energy food source (as APHIS notes) for birds that are molting and preparing to migrate after the nesting season. (United States Environmental Protection Agency, Chicago, IL - #B1-162.12.25100.100)

If the total crop loss is about 4-7 million and of that there is always going to be some loss with any crop say 2-3.5 million (out of about 200 million 1 to 1.75 percent—very low) then you are left with 0.5-5 million in losses. I understand that a lot of them are in the same areas year after year—now I would suggest that the farmers in these areas learn to work with nature a little instead of trying to bend it to their goals—and plant a different crop that wouldn't be so affected by blackbirds, say soybeans; I mean you wouldn't try to grow rice in the desert or wheat in a pond and if you do do very unnatural things then you are bound to fail eventually, and spend a lot of energy and lives doing it (See papers by Holling and others). (Individual, Fountain City, WI - #B3-333.2.25100.906)

Encourage agricultural practices that would diversify crop types planted per farmer in areas chronically susceptible to blackbird predation on sunflowers, so losses that may occur in sunflower crops are not economically fatal. (Individual, Milwaukee, WI - #B3-408.18.25100.903)

Encourage and reward farmers for diversifying their crops more widely each year, so that any damage done by blackbirds becomes insignificant to each individual farmer's profits. (Individual, No Address - #B3-454.8.25100.903)

What other crop species can be planted in the areas at risk of blackbird damage, besides sunflowers? Can farmers change crops and still make a good living? Are there high and low risk areas to grow sunflowers because of blackbirds? Can these high or low risk areas be identified? (Preservation/Conservation Organization, Rapid City, SD - #B1-105.10.25100.920)

INCREASING SUNFLOWER PRODUCTION BY TWO PERCENT

Perhaps the solution is to plant 2 percent more crops and not worry about the birds consuming their portion of the crops! (Individual, Roseburg, OR - #B3-89.2.20200.903)

According to the Scoping Document, "Reducing Damage Caused by Blackbirds to Commercial Sunflower Crops in North Dakota and South Dakota," the extent of the perceived problem is a loss of a mere 1 to 2 percent of total production. In dollar terms, the estimated loss is \$4 to 7 million dollars annually, out of a total commercial crop value of \$188 million dollars. These percentages and dollar amounts are minimal compared to the death and destruction being visited upon birds and wetlands under the current policy, which most likely costs more than \$4 to 7 million dollars a year to administer. A simple solution would be to have farmers plant an additional 1 to 2 percent of their crops that they could then allow the blackbirds to have. Some form of government subsidy could also be considered, either to cover the cost of this extra planting or to subsidize the economic loss of 1 to 2 percent of the planted crop. (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.12.20300.900)

PLANTING AWAY FROM MIGRATION ROUTES AND ROOSTING AREAS

To attempt to grow a crop that coincides with the blackbird southward migration is pure lunacy. Are you actually surprised that no single blackbird damage management method has proven satisfactory? It is the height of arrogance to think that man has the right to poison, hunt, and destroy any natural creature to grow a crop that is not compatible with the area. With the prevailing attitude, you probably believe that people have the right to grow crops in the middle of Manhattan and everything that gets in their way, must be destroyed. (Individual, Cave Creek, AZ - #B3-24.1.25100.700)

I am very concerned that the federal government is evaluating the control of blackbirds in order to assist farmers that are growing sunflowers along the natural migratory route of blackbirds. This is similar to assisting homeowners who experience loss of property because they built their home along a geologic fault line, or in a floodplain, or in other high-risk areas. Farming is risky. Deciding to grow row crops along a major flyway, when those crops are a source of food for birds is very risky. That's the cost of doing business gang. Let the market decide the cost of sunflower seed, without government assistance. Besides, the scoping document indicates that "bird damage averages about 1-2 percent in North Dakota and South Dakota." Two percent, in my mind, is pretty darn low, when most retail markets experience a greater loss due to theft. (Individual, Omaha, NE - #B3-392.1.90320.906)

Since "most damage occurs within two miles of blackbird roosts" why not advise against planting close to roosting areas, and leave the birds alone? Planting a feast of sunflowers directly in the path of their migration and roosting doesn't make sense. (Individual, Sunnyvale, CA - #B3-113.3.25100.903)

These negative impacts should be avoided altogether if sunflower growers understood the folly of growing bird food next to good bird habitat. Blackbirds are going to depredate sunflower fields as long

as the fields are close to marshes. The ultimate solution is to grow sunflowers in fields farther from marshes. (Individual, Great Bend, KS - #B2-2.4.25100.906)

I find it disturbing that after people have completely destroyed much of the habitat needed by birds and other creatures, and then planted a vast amount of one of their favorite foods in a main migratory route, that some people would be willing to kill millions of a species over a relatively small amount of money. (Individual, No Address - #B3-446.3.70100.920)

Non-Lethal Methods

Non-Lethal Methods General

Non-Lethal Methods – General Considerations

67. Public Concern: APHIS/Wildlife Services should use non-lethal methods to control red-winged blackbirds.

I would like the growers to find creative and non-lethal ways to control blackbirds. I believe that both the growers and the birds have a right to exist, so ways must be found to accommodate both. (Individual, Staten Island, NY - #B3-5.2.25100.700)

There is currently no policy that requires recipients of Wildlife Services to employ non-lethal methods before receiving assistance in lethal control from Wildlife Services. To the contrary, Wildlife Services frequently employs preventative lethal control measures prior to any documented damage. The list of alternatives presented is seriously defective in that there is no non-lethal alternative only included in this list. Such an alternative should have been offered. Implemented, it would allow for federal assistance to sunflower growers in blackbird control, could aid in the development of an effective and humane long term blackbird control strategy, and would be much more socially acceptable to the general public. We ask you to look at it this way. The people who buy wild birdseed do so because they love birds; the vast majority of them love ALL birds. They don't discriminate among species. (Preservation/Conservation Organization, West Covina, CA - #B3-296.1.20110.920)

APHIS should include an alternative focusing on non-lethal techniques that can be used to control red-winged blackbird damage in the project area. Non-lethal techniques described in the preliminary materials (i.e. "audio and visual frightening devices, growing bird-resistant sunflowers, increasing weed control in fields, and growing decoy crops") should be the focus of the alternative. U.S. EPA believes that this alternative should exclude the glyphosate habitat control proposal for reasons that are detailed below in Impacts to Wetlands. Also, APHIS should include in this alternative the possible use of falconers-raptors teams in sunflower crop areas as a deterrent for bird damage. Since this type of deterrent has been used successfully in other contexts to reduce problem bird populations, the utility of this largely non-lethal control measure in sunflower fields should be explored. (United States Environmental Protection Agency, Chicago, IL - #B1-162.9.20200.100)

I urge the U.S. Department of Agriculture to fully evaluate and pursue effective non-lethal controls including altering farming practices; using noise, distress calls, and visual frightening devices; growing decoy crops; and increasing weed control. (Individual, Carmel, IN - #B3-283.2.25200.417)

I urge you to utilize the "non lethal" reduction methods that you have proven to be successful and that you have at your service: altering farming practices, using audio and visual frightening devices, growing bird-resistant sunflowers, increasing weed control in fields, and growing decoy crops. Further, I encourage you to continue to explore new and more effective "non lethal" methods for future situations. (Individual, East Lansing, MI - #B1-188.2.25200.417)

BECAUSE NON-LETHAL METHODS ARE EFFECTIVE

I am totally and vehemently opposed to your plan to poison millions of Red Winged Blackbirds in North Dakota. There is no reason for this terrible massacre when you found a large degree of success with your non-lethal program of dealing with vultures in Staunton, Virginia. (Individual, Mechanicsville, VA - #B3-126.1.25000.920)

BECAUSE LETHAL METHODS ARE INEFFECTIVE

Removing the birds through killing does not solve the problem. Other birds will move in the area if nothing is done to modify the habitat or food supply. Please use only non-lethal approaches. Noise-makers, scare devices and dogs can all provide a long-term solution. (Individual, Grandview, MO - #B1-90.2.25200.417)

I urge you to drop plans for poisoning birds for any reason. This is not a rational way to solve any perceived problem; it will just create more problems down the road and cause a lot of suffering in the process. Please follow the advice of intelligent experts and proceed in a manner that protects the health and well-being of people and the environment. (Individual, Phoenix, AZ - #B3-224.1.25200.920)

According to HSUS [Humane Society of the U.S.], Avitrol, as well as the use of any poison to lethally control bird populations, is ineffective and inhumane. Communities should protest its use and insist that only non-lethal methods of bird population control be employed. (Preservation/Conservation Organization, West Covina, CA - #B3-296.5.25200.700)

68. Public Concern: APHIS/Wildlife Services should use non-lethal methods available from the Fund for Animals and the Humane Society.

I strongly urge you to use one of the many non-lethal control methods available from The Fund for Animals and The Humane Society of the US. (Individual, Naples, FL - #B3-70.2.25200.100)

69. Public Concern: APHIS/Wildlife Services should determine whether non-lethal methods have been used correctly in the past.

Killing six million birds to suit the profit of sunflower farmers is wrong. The non-lethal methods can work, as mentioned in your report. For those that it hasn't worked for, has there been any investigation into if they used the methods properly? Killing these birds at the request of a lobbying group is wrong. The methods are painful and cruel. (Individual, Madison, WI - #B3-581.2.25200.106)

Non-Lethal Methods – Public Involvement/Support Considerations**70. Public Concern: APHIS/Wildlife Services should use non-lethal methods to control red-winged blackbirds.****TO AVOID A NEGATIVE PUBLIC REACTION**

Hundreds of thousands of blackbirds have been killed since 1995. I hope instead of lethal methods you'll use pop-up scarecrows, cultural practices (i.e. planting lure crops and avoidance of planting sunflowers near wetlands—the blackbirds habitat) and reintroducing cougars, coyotes, wolves, bobcats, and other predators. Cases such as this have begun to receive national and international attention. Please use this opportunity to be on the cutting edge of treating animals humanely. (Individual, Phoenix, AZ - #B3-12.4.25200.700)

Poisoning birds because of growing birdseed would be terrible public relations for the farmers of North and South Dakota. (Individual, Wauzeka, WI - #B3-399.4.60100.905)

Non-Lethal Methods – Environmental Considerations

71. Public Concern: APHIS/Wildlife Services should use non-lethal methods to control red-winged blackbirds.

BECAUSE OF THE POTENTIAL FOR NEGATIVE SIDE EFFECTS WITH THE USE OF LETHAL METHODS

After reading the information supplied regarding damage caused by blackbirds to sunflowers, I was even more alarmed than before. The methods being used and proposed seem especially damaging to not just blackbirds but to people, non-target species, and the wetlands. I would like to see non-lethal measures taken. (Individual, Larkspur, CO - #B3-124.1.25000.920)

BECAUSE OF THE POTENTIAL FOR LETHAL METHODS TO CAUSE EXTINCTION

Please use non-lethal control methods to reduce sunflower crop damage by blackbirds.

We realize farmers need to make money but plenty of birds have already become extinct in this country by our history of killing them to keep the profits high in agriculture. An example is the native parakeet population in North Carolina wiped out by the fruit farmers over 100 years ago. Now we can only see these birds in books. Will the same thing happen to the red winged blackbirds? Is this the type of legacy we want to leave to our children and grandchildren? (Individual, Fuquay Varina, NC - #B3-357.1.25200.920)

BECAUSE OF THE POTENTIAL EFFECTS OF LETHAL METHODS ON MIGRATORY BIRDS AND WETLAND LANDSCAPES

Migratory birds are already experiencing unprecedented drop-offs in their populations. The steep, rapid decline of most species of birds, including Neo-tropical migrants, has been well documented in scientific literature. The number of birds added to the Endangered and Threatened List of the U.S. Fish and Wildlife Service grew dramatically in the 1990s. In 1987, there were only 30 species on that list. When the list was updated on 1995, 98 species were added.

For all these reasons, the Webster Groves Nature Study Society opposes the U.S. Department of Agriculture's bird poisoning plan and urges the use of alternative, benign methods of crop protection. (Individual, Glencoe, MO - #B1-163.7.25000.416)

Migratory birds of all kinds have already experienced unprecedented drop-offs in their populations. The steep, rapid decline of most species of birds, including Neotropical migrants, has been well documented in scientific literature. The number of birds added to the Endangered and Threatened List of the U.S. Fish and Wildlife Service grew dramatically in the 1990s. In 1987, there were only 30 species on that list. When the list was updated in 1995, 98 more species were added, in increase of more than 300 percent! Scientists estimate that Neotropical migrants have declined by more than 50 percent in the last 30 years, and some species have declined by over 90 percent. Habitat loss and pesticide/herbicide use are the two largest causes of that decline. And these primary causes are the very "solutions" that are being proposed in the plan to poison blackbirds and eradicate cattail habitat.

Nowhere in the Scoping Document does it say how the poisoned bait plan can be actually limited to blackbird species—because it cannot be. Instead, the Scoping Document just refers to blackbird species as the "target" species. In reality (as opposed to conceptual plans), it is impossible to restrict the poisoning to blackbird species. Therefore, the plan is really a broad-based attack on birds in general, with the indirect goal being that some blackbirds are killed. The truth is that many bird species have already been killed—a glaring omission in the Scoping Document, which sounds as if the proposed plan is brand new. On the contrary, the proposed plan has been in effect for many years, many bird species besides blackbirds have been killed, and that information is not being disclosed in the Scoping Document. In fact, the Scoping Document does not even say how many blackbirds have been killed as a result of the ongoing poisoned bait policy. (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.9.25000.912)

The Webster Groves Nature Study Society urges the USDA/APHIS to terminate this scientifically unsound project immediately. Should APHIS proceed with the preparation of an Environmental Impact Statement, we ask that you recommend a preferred alternative that does not involve the poisoning of protected migratory bird species or the destruction of wetland landscape (cattails). (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.2.20200.425)

Non-Lethal Methods – Social Considerations

72. Public Concern: APHIS/Wildlife Services should use non-lethal methods to control red-winged blackbirds.

BECAUSE LETHAL METHODS ARE INHUMANE

Please use non-lethal methods to control crop damage by blackbirds. I understand that action is needed, but I can't believe a government department would use anything other than humane, non-lethal methods to control these birds. Please reconsider your methods. (Individual, South Portland, ME - #B3-45.1.25200.417)

I think your plan to poison as many as six million red-winged blackbirds is cruel and threatening to the wildlife and the environment. Please rely only on non-lethal control methods to reduce crop damage by blackbirds. Genocide of wildlife is not the answer. (Individual, Syracuse, NY - #B3-258.1.25000.920)

I'm concerned about the humane aspect of the proposed poisoning program. Considering that non-lethal approaches to this problem have been "somewhat effective," I feel it is imperative that these alternatives continue to be explored, expanded and utilized. (Individual, Owings Mills, MD - #B3-247.3.25200.700)

I am writing today to urge the U.S. Department of Agriculture/Wildlife Services not to proceed with the poisoning of blackbirds to protect sunflower crops, and instead to please rely only on non-lethal methods of control. As many as six million red-winged blackbirds would die if this poisoning were to occur; I feel this is completely intolerable. This unprecedented attack on their species is nothing short of genocide.

Please, use only non-lethal control methods to reduce the damage the blackbirds would cause to the sunflower crops you wish to protect. (Individual, San Andreas, CA - #B3-60.1.25200.417)

Please consider other alternatives to red-winged blackbird control besides killing them in huge numbers. The methodology seems particularly cruel and unjust. We have created a situation where we are supporting an unnaturally large population of blackbirds and need to think of creative solutions. (Individual, Atlanta, GA - #B3-135.1.20200.700)

Non-Lethal Methods – Economic Considerations

73. Public Concern: APHIS/Wildlife Services should use non-lethal methods to control red-winged blackbirds.

BECAUSE LETHAL METHODS ARE NOT JUSTIFIED ON ECONOMIC OR SCIENTIFIC GROUNDS

We are particularly concerned about the limited alternatives that the proposed EIS will consider. The three alternatives Wildlife Services proposes to analyze in detail in the EIS are all based on the premise that killing millions of red-winged blackbirds is the primary solution to reducing damage to sunflower crops in the area. We believe this is a flawed premise as outlined in our earlier comments. Previous killing of millions of blackbirds has not been justified on economic or scientific grounds and has not solved the problem for the sunflower growers. (Preservation/Conservation Organization, Washington, DC - #B3-423.2.20200.912)

BECAUSE LETHAL METHODS ARE NOT A GOOD USE OF TAXPAYER MONEY

Please find a humane, non-lethal plan to deal with the blackbirds. I do not want my tax dollars to be used to poison birds and other animals. (Individual, New Braunfels, TX - #B3-202.2.25200.913)

The lethal methods are a complete waste of taxpayer money and will only cause more unforeseen results that will then require more taxpayer money to fix. (Individual, Brainerd, MN - #B3-383.2.25200.920)

I think it is time that nature be left to attend to its own needs without man's interference and perhaps this tax money could be spent for the betterment of nature. (Individual, No Address - #B3-358.3.25000.913)

I am a taxpayer, and am appalled by some of the waste of government resources to . . . benefit a few welfare farmers, especially when it's a lost cause! (Individual, Langley AFB, VA - #B3-90.9.90200.913)

TO SPREAD THE COST OF RED-WINGED BLACKBIRD DEPRADATION

Non-lethal methods should be focused in areas where spatial patterns determine that blackbird depredation is concentrated. A fairly short window of time exists where non-lethal methods would need to be implemented to protect ripe sunflowers. Prompt action by local agriculture extension offices and Wildlife Services could prevent the decimation of any single grower's crop—essentially spreading bird damage more evenly among area growers so that it is absorbed collectively by the entire sunflower grower community at the 1-2 percent average loss for sunflowers from all birds. (Preservation/Conservation Organization, Washington, DC - #B3-298.19.25200.906)

Pop-Up Scarecrows and Propane Cannons

74. Public Concern: APHIS/Wildlife Services should encourage the use of pop-up scarecrows and propane cannons.

The new scoping document at E.1a.8, notes that pop-up scarecrows and propane cannons are cost effective for sunflower producers experiencing a depredation loss of more than 18 percent. We would suggest that the U.S. Department of Agriculture/APHIS/WS promote and support the use of these measures where sunflower loss is heavy as they work better and are more cost-effective than many alternatives, including killing the blackbirds. (Preservation/Conservation Organization, Washington, DC - #B3-298.15.25210.100)

My father works in agriculture, so I have seen other methods of keeping birds and other animals out of crops, such as "propane canons" that make a loud noise to scare animals away. So please consider an alternative to killing the blackbirds. (Individual, No Address - #B3-483.2.25210.417)

There are non-lethal alternatives. Get a scarecrow!!! (Individual, South San Francisco, CA - #B1-68.3.25200.920)

Almost five percent of the sunflower producers in both states experienced more than 25 percent crop loss. Scarecrows and cannons were cost effective if used where losses exceeded 18 percent. So use those methods, make it mandatory on those acres belonging to that five percent of the farmers. (Individual, Mendocino, CA - #B3-118.7.25210.909)

Pop-up scarecrows and propane cannons—we believe these methods of frightening blackbirds are acceptable but understand that they are only cost effective for producers experiencing a high level of loss. (Individual, Folsom, CA - #B3-456.8.25210.903)

Lure Crops

75. Public Concern: APHIS/Wildlife Services should encourage the use of lure crops.

A possible solution to consider: since Red Winged blackbirds are migratory birds, an area could be established for the birds along their migration routes which could be cover cropped with seeds and plants that the birds eat and may find preferable to the protected crops. This might consist of smaller or larger sunflower seeds, small-fruited trees and thistles. The migrating birds would then stay in a more concentrated area without destruction of crops. The more closely the birds' stay together, the more likely the population will be kept in check. (Individual, Pine Knot, KY - #B1-53.2.20200.425)

Your investigation of "lure crops" should include the use of native/wild sunflower seeds sown in untilled grasslands such as along roadsides. In South Dakota, such native sunflowers might replant themselves and persist without costly intervention by man. (Preservation/Conservation Organization, Rapid City, SD - #B3-452.6.25110.601)

I suggest that you scatter wild sunflower seeds in the uncultivated fields and along roadsides in the area. I believe this will not be costly beyond the first year, as the native seed will reproduce in the wild by itself. Perhaps the blackbirds will disperse along the roadsides to eat these sunflowers and have fewer impacts on cultivated fields. The sunflowers and birds will also be beautiful to watch along the roads. (Individual, Rapid City, SD - #B3-453.1.20200.100)

What else besides sunflowers are part of the blackbird's diet? [Provide] other food sources that might draw the blackbirds away from some of the sunflower crops. Increase the acreage of sunflower crops. Designate certain sunflower crops areas as feeding location for blackbirds don't grow sunflowers for 2-3 years (subsidizing the sunflower growers). Blackbirds would have to change their migration and feeding patterns. (Individual, Santa Maria, CA - #B3-85.1.20200.417)

I would like to see the corporate farms and individual farmers respond to any damage by luring the blackbirds away from an area or by planting for the birds. (Individual, Seattle, WA - #B3-103.5.25110.903)

Aerial Hazing

76. Public Concern: APHIS/Wildlife Services should encourage aerial hazing.

Reevaluate aerial hazing. This option was rejected because of its not being cost-effective for APHIS-WS. However, it was not cost-effective as a control in and of itself. This method has not been evaluated in terms of environmental impacts. Economic cost is just one consideration. I am interested in how this may weigh out against other alternatives. Growers can still use it. The growers need to take some responsibility here. If the goal is to reduce blackbird damage, then this could be a viable alternative when combined with other options. (Individual, Omaha, NE - #B3-392.15.25220.909)

77. Public Concern: APHIS/Wildlife Services should address the effectiveness of aerial hazing.

Here are some questions/issues I would like addressed in the EIS:

I would like to know about the effectiveness of the aerial hazing programs conducted from 1986 to 1994. (Individual, Grandview, MO - #B3-462.3.25220.912)

Cattail Management

Cattail Management General

78. Public Concern: APHIS/Wildlife Services should implement a cattail habitat reduction program.

I encourage the use of methods that seek to restore balance to ecosystems disrupted by human presence and agriculture. As I understand from the Audubon Society, an environmental organization serving bird lovers, birds, and our shared environments, we have alternate solutions, namely reducing introduced cattail species. (Individual, Oakland, CA - #B3-440.2.20200.400)

Addressing the root of the problem, an over-abundance of cattails, especially introduced varieties, in the Dakotas, would be far simpler, and more ecologically acceptable. There are herbicides with minimal environmental impact that could be utilized to eradicate these cattails. (Individual, Duluth, MN - #B3-406.5.25230.414)

The best way to help the farmers would be to remove foreign cattails from the potholes and marshes in the area. If you really want to make a lasting effect, change the environment so that it is less inviting to them. The less nesting areas, the less birds. And please don't think that I mean all of the Blackbirds should be removed from the area. I would like to see a balance between the natural world and our artificially created one. (Individual, Ironwood, MI - #B3-287.2.25230.920)

There is an abundance of nesting sites for Blackbirds among the cattails, many of them introduced species, that have proliferated throughout the upper mid-west of the U.S. This is where your concentration should be. Eliminate the invasive plant life that provides nesting, and you have made a long-term reduction in Blackbirds. Simply poisoning them is a futile, short-term solution. (Individual, Grafton, WI - #B3-316.3.47100.409)

The root causes of this problem are found in the way that we have altered the landscape. In particular, it is the intentional and accidental spread of a non-native cattail plants in the Midwest, which have become an exotic weed problem in many locations, just like purple loosestrife and buckhorn provides breeding habitat that allows Red-winged Blackbird populations to flourish while waterfowl and other bird populations suffer. I urge you to focus your attention on habitat and controlling the spread of exotic species, especially cattails that are not native to the Midwest, and do not use the proposed poisoning approach. (Individual, Duluth, MN - #B3-441.2.47200.417)

FOR GREATER LONG TERM RESULTS

Reduction of successful breeding habitat (via habitat restoration or predator management, for example) provides greater long-term potential population control than killing adult birds. (Individual, Milwaukee, WI - #B3-408.2.20200.417)

TO THIN EXOTIC SPECIES AND ALLOW FOR BIODIVERSITY

It has been demonstrated that cattail reduction is also an effective method. Because the blackbirds roost in cattails, they tend to go elsewhere. Also, cattail reduction has also been shown to enhance the area by encouraging a greater diversity of species. (Individual, La Canada Flintridge, CA - #B3-172.2.25230.413)

Habitat restoration through cattail control should be given much more serious consideration and should be the focus of an alternative. The main concentrations of birds causing problems to a minority of farmers are migratory. Lethal control is therefore by definition an ineffectual way to reduce damage. These are not resident birds. These are flocks of birds that belong to other states and countries. The dominant cattail, *Typha angustifolia*, is an alien species that has degraded the wetlands of the Dakota. A

focused program that restored the diversity of the wetlands by cattail control would make these same wetlands less attractive to roosting blackbirds. Instead of measuring deleterious impacts on bird populations, the measures would most likely be those of enhanced plant and animal diversity of restored wetlands and reduced proximity of blackbirds to vulnerable fields. The scoping document does not seem to appreciate the potential, nor the biology, inherent in restoring wetlands dominated by alien cattails. In fact, nowhere in the scoping document is the alien status of the dominant cattail species even acknowledged. (Individual, Iron River, MI - #B3-112.14.25231.406)

BECAUSE IT WOULD BE MORE EFFECTIVE THAN A LETHAL METHOD OF CROP PROTECTION

Reduction of red-winged blackbird breeding habitat may control populations more effectively than removing adult birds with poison.

Would improving aquatic and marsh plant diversity (i.e. removing monoculture cattail stands in problem areas and replanting with mixed native species) disperse problem flocks? (Individual, Milwaukee, WI - #B3-408.7.25230.100)

I am concerned about the proposal to poison Red Winged Blackbirds in North and South Dakota using rice laced with avicide DRC-1339 during spring migration.

This does not get to the root of the problem, which is the spread of non-native cattail plants. These could [be] more easily and less environmentally harmfully exterminated and would support native wildlife in a better balance. (Individual, Duluth, MN - #B3-407.1.25230.425)

BECAUSE AN ENVIRONMENTAL ASSESSMENT HAS ALREADY BEEN PREPARED FOR A CATTAIL MANAGEMENT PROGRAM

PETA believes that WS [Wildlife Services] already has the information required to make the same conclusion we have regarding the impact the proposed program will have on the environment. WS's own scientific data suggests that cattail management can effectively reduce crop damage caused by black birds and avicide applications will not. According to the scoping document, WS has already prepared an environmental assessment (EA) under NEPA for the cattail management program. Therefore, we urge WS to halt the preparation of the EIS on the proposed Integrated Adaptive Management Program alternative. (Preservation/Conservation Organization, Norfolk, VA - #B3-433.4.25230.417)

79. Public Concern: APHIS/Wildlife Services should not implement a cattail habitat reduction program.

BECAUSE OF THE POTENTIAL EFFECTS ON WETLANDS

The current policy has resulted in the devastation of wetlands through herbicides applied to wetlands. No figures are given on how many acres of wetlands have been poisoned by these herbicides. Wetlands are the most endangered habitat in North America. The plan to eradicate habitat in the hopes of eliminating blackbird roosts and nesting sites is barbaric. Many plant and wildlife species inhabit those wetlands, not just blackbirds. (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.10.25230.414)

The plan to kill thousands of acres of cattails defies common sense. There would be no possible way to destroy blackbird-nesting habitat without also destroying the habitat of everything that uses the same wetlands. Putting a large amount of toxins in the wetland environment will have many unpredictable and potentially disastrous consequences. (Individual, No Address - #B3-446.2.25230.425)

BECAUSE OF THE POTENTIAL EFFECTS ON WETLAND WILDLIFE

By reducing nesting and living habitat, such as through cattail destruction, you jeopardize the lives of countless other species. Not only are they endangered, but all the wetlands animals become entangled in a desperate search for food and shelter, leading to a miserable struggle for survival and eventual death through starvation exposure and territorial aggression from other birds. (Individual, Greenville, NC - #B3-532.3.25230.414)

Cattail marshes, which often provide small islands of native habitat in a sea of agriculture, provide important habitat for a number of animal species. Other birds, including some species of concern such as American bitterns, black terns, forster's terns, horned grebes and short-eared owls, use cattail marshes during the breeding season. Impacts to these species and minimization measures should be addressed in the EIS. (Minnesota Department of Natural Resources, Saint Paul, MN - #B2-4.8.46200.425)

The cattail management program should be discontinued and DRC-1339 baiting should not be done in the future. In addition to the futility of these programs discussed above, the programs pose significant risks to non-target birds. (Individual, Phoenix, AZ - #B3-86.4.25230.418)

BECAUSE IT MAY LEAD TO AN INCREASE IN EXOTIC AND NUISANCE SPECIES

I am concerned that using chemical means to rid areas of cattails will increase the exotic and nuisance species. (Individual, Seattle, WA - #B3-103.2.25230.409)

80. Public Concern: APHIS/Wildlife Services should substitute lands farther out for cattail growth areas.

Third action includes elimination of all cattails where feasible, and when nearer than six miles from the crops. Substitute lands farther out for cattail growth areas. (Individual, Roseburg, OR - #B3-89.5.20200.406)

81. Public Concern: APHIS/Wildlife Services should identify the vegetation expected to replace cattails.

The EIS should state what plants and/or community types are expected to become established after cattail stands have been destroyed. Measures to control exotic or invasive species (e.g., purple loosestrife, reed canary grass) from invading the area should be identified. (Minnesota Department of Natural Resources, Saint. Paul, MN - #B2-4.7.47200.400)

Adequacy of Analysis – Cattail Management

82. Public Concern: APHIS/Wildlife Services should analyze the potential environmental effects of cattail management programs.

We have the following concerns regarding potential environmental impacts, including:

What are the impacts to wetland species, both wildlife and plants, of the proposed use of herbicides to reduce cattail habitat?

What are the impacts to wetland species, both wildlife and plants, of the reduction in wetland acreage?

What are the impacts to wetland species, both wildlife and plants, of the fragmentation of wetlands (by destroying swaths of cattail habitat)? (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.15.25230.405)

There has been a well-documented loss of wetlands in North America. This has negatively impacted breeding populations of certain species of wild birds and also has negatively affected water quality in many communities.

What would be the environmental impact of increasing the number of acres of cattail wetlands treated? What would be the impact of the overall quality of wetlands? How would increased treatment affect plants and animals, especially breeding birds? (Individual, No Address - #B3-142.9.40100.425)

There are too many scientific questions. You characterize the use of an herbicide to reduce cattail stands as a non-lethal technique, yet you provide no information at all about the secondary effects of using this herbicide on flora and water systems in the vicinity of application. Without further information, it seems premature to characterize application of the herbicide as a non-lethal technique. (Individual, Saint Paul, MN - #B1-119.3.25230.425)

Potential water quality effects from herbicide application or loss of cattails should be a significant issue. Will the loss of cattails affect the aquatic conditions; such as raise the temperature of the water or affect sedimentation? (Preservation/Conservation Organization, Rapid City, SD - #B3-452.7.43100.424)

Please discuss the impacts to wetland and aquatic species of the use of herbicide to control cattail populations. How can the destruction of cattail habitat be considered "non-lethal?" Isn't it lethal to plants and any wildlife/fish that are obligated to the habitat provided by the cattails? What species are obligated or strongly associated with cattails? What is the effect on water quality and wetlands integrity of killing the cattails with herbicide? What is the effect of the herbicide on water quality? Are there any threatened and endangered fish that may be in the wetlands? (Preservation/Conservation Organization, Rapid City, SD - #B1-105.7.25230.425)

BECAUSE OF THE POTENTIAL EFFECTS ON CATTAIL RECOVERY

How fast do cattails recover from the herbicides? What will be long term effects of continuous cattail poisoning? (Preservation/Conservation Organization, Rapid City, SD - #B3-452.4.47100.425)

BECAUSE OF THE POTENTIAL EFFECTS ON RARE PLANT SPECIES

The Scoping Document proposes the use of a broad-spectrum herbicide that will destroy all plant species in the application area. Perhaps as many as 20 percent of the cattail marshes in the range of sunflower farming in Minnesota provide habitat for rare plant species. Impacts to these species and minimization measures should be addressed in the EIS. (Minnesota Department of Natural Resources, Saint Paul, MN - #B2-4.9.25230.416)

BECAUSE OF THE POTENTIAL EFFECTS ON RECREATION

We took steps this past fall to reduce the blackbird habitat by mowing and/or burning cattails in and around our sloughs for 2002 sunflower production. However, I feel this action is detrimental to our pheasant, grouse, and duck population. Hunting and recreation in North Dakota will be affected by this action. It is likely that some of our cattails will be sprayed in 2002. (Business, Coleharbor, ND - #B3-640.4.47100.800)

83. Public Concern: APHIS/Wildlife Services should analyze the effect of cattail reduction on sunflower losses from birds.

While some non-lethal tactics have been used with little effect, alternative measures to the problem of financial and sunflower loss from bird species are lacking in comprehensive analysis in other aspects of red-winged blackbird ecology (decreasing cattail prevalence) are not adequately addressed. (Individual, No Address - #B3-436.2.20300.912)

Use of Glyphosate

84. Public Concern: APHIS/Wildlife Services should use glyphosate.

I think the use of glyphosate to destroy the cattails used for nesting of the red-winged blackbirds seems like the lesser evil. (Individual, Florissant, MO - #B3-421.3.25231.417)

Habitat reduction by application of glyphosate seems like a good idea. I believe that the number of other bird species in the area could increase as a result (Individual, Saint Paul, MN - #B3-19.2.25231.421)

PROVIDED THAT RESEARCH SHOWS IT TO BE SAFE

I would like to see the herbicide glyphosate applied to additional cattail acreage, proximate to sunflower growing areas, provided that studies on the effects of glyphosate on wetland biodiversity show little or no adversity. This could be combined with non-lethal scare tactics. (Individual, Southport, CT - #B3-1.4.25231.100)

The main issue is minimizing losses near wetlands. The cattail reduction program offers the most promise, provided that it is limited in scope—limited, that is, to the wetland areas that are directly adjacent to ‘problem’ sunflower acreage, and that the research projects currently under way indicate that glyphosate does not badly affect the wetland ecosystem. (Individual, Downingtown, PA - #B3-304.2.25231.400)

BECAUSE IT IS SAFE AND EFFECTIVE

According to the scoping document, the most promising sunflower damage control method is cattail monoculture reduction. Not only does cattail reduction destroy blackbird habitat, and therefore reduce crop damage, it restores biodiversity lost due to the invasion of hybrid hydrophytes. Glyphosate, the herbicide used to control cattail monocultures, is relatively innocuous and when used in low concentrations, poses little threat to other organisms. From 1989 to 1992, NWRC [National Wetlands Research Center] evaluated the effectiveness and environmental impacts of glyphosate to reduce blackbird roosting habitat and increase the quality of waterfowl habitat in cattail monocultures. As a result, cattail reduction was evident the following year, and data indicate a positive correlation between blackbird numbers and the acreage of cattails and between blackbird numbers and amount of damaged sunflower in adjacent sunflower fields. Due to these promising results, WS initiated a statewide cattail management program in North Dakota and South Dakota in 1991. PETA [People for the Ethical Treatment of Animals] supports the continuation of the cattail management program under the proposed Integrated Adaptive Management Program. (Preservation/Conservation Organization, Norfolk, VA - #B3-433.5.25231.406)

RATHER THAN AVICIDE

PETA [People for the Ethical Treatment of Animals] strongly opposes the implementation of lethal control policies that involve the use of cruel avicides, especially since previous studies conducted by WS [Wildlife Services] have disproved the efficacy of avicides in reducing crop damage caused by blackbirds. After almost ten years of work, WS and the National Sunflower Association should now recognize the simple fact that reducing damage to sunflowers by killing blackbirds is impractical, if not impossible. Based on its own scientific data, WS has no reason to believe that poisoning two million blackbirds every year for three years during spring mitigation will provide growers with the relief they seek. Therefore, we respectfully request that WS halt the preparation of an EIS on the proposed alternative, and instead, rely on information provided in the Environmental Assessment WS prepared under for extensive cattail management using the herbicide glyphosate. (Preservation/Conservation Organization, Norfolk, VA - #B3-433.7.25231.920)

85. Public Concern: APHIS/Wildlife Services should not use glyphosate.

I am opposed to the use of glyphosate to destroy habitat. (Individual, New Ulm, MN - #B3-415.2.25231.414)

BECAUSE OF THE POTENTIAL EFFECTS ON WILDLIFE

Glyphosate treatment of cattail marshes could harm insects and other wildlife (Individual, No Address - #B3-454.2.25231.425)

BECAUSE OF THE POTENTIAL EFFECTS ON WILDLIFE HABITAT

Audubon also strongly opposes the so-called non-lethal technique of using glyphosate herbicide (commonly known as Roundup) on cattail stands larger than 10 acres. In effect, Wild Services is proposing the killing of all vegetation in selected wetland areas. This sterilization of the cradles of some of the most productive wildlife habitat for birds, waterfowl, and animals simply defies common sense. What consideration has Wildlife Services given to the effect this significant destruction of critical habitat will have on birds and wildlife? (Preservation/Conservation Organization, Washington, DC - #B1-156.4.25231.414)

BECAUSE OF THE POTENTIAL HEALTH CONSEQUENCES TO HUMANS

Glyphosate is responsible for a number of work-related disabilities in the United States. In 1986, it ranked third in the number of human health illnesses reported in California from exposure to pesticides and herbicides—illnesses including nausea, headaches, and nervous system disorders. In 1995, in

California, glyphosate ranked eighth in this category. In short, Roundup appears to have a considerable potentiality for toxicity to humans as well as organisms in the ecosystem. If Wildlife Services has not yet experienced undesirable human and environmental side effects from using products containing glyphosate in combination with surfactants, it is probably just a matter of time before this does occur. (Preservation/Conservation Organization, West Covina, CA - #B3-296.13.25231.702)

According to an article by Carolyn Cox of Northwest Coalition for Alternatives to Pesticides (NCAP), in California, between 1984 and 1990, glyphosate was the third most frequently reported cause of illness related to agricultural pesticide and herbicide use.

That same article states that glyphosate can be persistent. Cox sites tests performed by Monsanto showing that up to 140 days are needed for fifty percent of the applied herbicide to break down or disappear from agricultural soils.

Glyphosates drifts. Cox states: "Tests" conducted by the University of California, Davis, found that glyphosate drifted up to 400 meters during ground applications and 800 meters during aerial application."

According to this authority (Cox) most herbicides also contain inert ingredients that function as surfactants, or chemicals that aid in the penetration of the herbicide to the plant cells. In the case of Roundup, the inert surfactant is polyoxyethyleneamine (POEA). On a weight basis, this surfactant is known to be approximately three times as toxic as that of Roundup. POEA accounts for 14.5 percent or more of the volume of Roundup products. Symptoms associated with POEA toxicity include gastrointestinal pain and vomiting, swelling of the lungs, and pneumonia, reduction of blood pressure, and red blood cell destruction. Current research suggests a synergistic effect of glyphosate with its surfactant, POEA. At high dosages, inhalation of the combined product can cause severe effects including lung hemorrhages, bloody noses, and diarrhea. (Preservation/Conservation Organization, West Covina, CA - #B3-296.11.40000.412)

Regarding the treatment of wetlands, including cattail roosting areas, with glyphosate to discourage blackbird habitation, this post-emergent, non-selective, broad-spectrum herbicide (Rodeo, Roundup, Roundup, Roundup Ultra, Pondmaster, etc.) is non-selective, and, contrary to Monsanto's claims of non-toxicity, there is a considerable amount of controversy regarding its toxicological effects. Glyphosate acid and its salts are generally considered to be moderately toxic compounds of an EPA toxicity class II, and are considered by some to have been proven to be not only ecologically harmful, but also toxic at a human level. One report states that where aerial application has been followed, an increase in various ailments has been noted among those residents of the applicable areas, some of those ailments being skin cancer, skins irritations, diarrhea, liver damage, lung congestion, and corrosive digestive problems. (Preservation/Conservation Organization, West Covina, CA - #B3-296.10.25231.920)

86. Public Concern: APHIS/Wildlife Services should indicate whether the proposed use of glyphosate will be consistent with labeling requirements.

Will the use of glyphosate on wetlands be consistent with labeling requirements? (Individual, Pittsburgh, PA - #B3-375.2.25231.405)

Adequacy of Analysis – Glyphosate

87. Public Concern: APHIS/Wildlife Services should analyze the effects of glyphosate.

We are not happy with any of the alternative proposals that will be evaluated in the EIS. Proposals 1 and 2 . . . continue the use of glyphosate before its effects on water quality and non-target species has been fully assessed and considered. (Individual, Folsom, CA - #B3-456.9.20100.425)

INCLUDING THE POTENTIAL POSITIVE EFFECTS

Why is Glyphosate control of cattails considered only to have negative impact on other species of wildlife? As I understand it, the cattail being targeted is primarily *Typha angustifolia* or the hybrid *Typha x glauca*, aliens that take over once diverse marshes and create an unnatural near-monoculture situation with reduced biodiversity. Glyphosate control may very well function to restore biodiversity, not have a negative impact. And yet, the scoping document postulates only negative impacts. Certainly most of the bird species on the proposed indirect impact list are those of diverse freshwater marshes, not alien cattail monocultures. Why are positive impacts of cattail control not included? It makes one suspect that APHIS wishes to find an excuse to dump the cattail control program prematurely. (Individual, Iron River, MI - #B3-112.12.25231.406)

BY INCLUDING A SURVEY OF RARE MARSH PLANTS BEFORE USING GLYPHOSATE

As for killing of endangered species of plants, surely a Glyphosate control program will include a survey for rare plants in a marsh before employing such a technique. Why is this standard procedures not included in the scoping document? Impacts on aquatic insect populations from surfactants, while they might occur, are extremely short term. Re-colonization of wetlands occurs quickly. This seems a strange item to elevate to a major component of an EIS scoping document. (Individual, Iron River, MI - #B3-112.13.25231.416)

Glyphosate—While this seems to be the most effective method of blackbird damage management that has been utilized thus far, we are concerned about the environmental damage that this chemical may be causing. We believe that the effects on water quality as well as the reduction of habitat for non-target species needs to be studied and strongly considered in the use of glyphosate.

What effects will the use of glyphosate and surfactants and other inert ingredients have on water quality and aquatic biota in the cattail wetlands? (Individual, Pittsburgh, PA - #B3-375.1.25231.424)

The Notice indicates the intent to treat cattail wetlands greater than 10 acres with a broad-spectrum herbicide (glyphosate) to eliminate the blackbird roosts. The EIS should address the following issues with respect to herbicide use in these wetlands to begin to characterize the impact to wetland ecology and the potential scale of these impacts:

Identify the ecological role that cattails play in these wetlands. These roles might potentially include sediment trapping, wildlife shelter, nesting and rearing habitat, wildlife foraging habitat, and water quality protection.

Identify other bird species that are likely to utilize wetlands that would be impacted by this project for migration and for breeding (e.g., American bittern, least bittern, Virginia rail, sora rail, yellow rail, various waterfowl, yellow-headed blackbird, marsh wren, swamp sparrow, etc.). Identify the effects of cattail removal on these species' use of these wetlands.

Describe the effects of glyphosate application on non-target vegetation in these wetlands. Identify whether submergent aquatic vegetation is affected, and the resulting extent to which waterfowl foraging capability would be effected.

Identify the number of wetland parcels and the total acres of wetlands to be treated in each. This should be considered in the context of direct, indirect, and cumulative impacts to wetlands. Also, describe the rate of treatment of these wetlands by glyphosate (pounds/acres).

Identify the distribution of sunflower growers that experience high levels of damage across the prairie pothole region.

Identify any listed wetland plant species that could potentially be impacted by glyphosate applications.

Identify the location of likely alternate migration resting sites when red-winged blackbirds are displaced from treated cattail stands. Identify the potential for agricultural impacts from these displaced birds. (United States Environmental Protection Agency, Chicago, IL - #B1-162.13.40100.405)

I am leery of the benefits of the use of glyphosate. It, too, is a potent chemical reminiscent of defoliants like Agent Orange. What specifically are the consequences of its use? It's explained in the Sunflower

Protection Scoping Document that there was an increase in the quality of waterfowl habitat after the use of glyphosate in cattail management. Would that benefit be strictly for game species of ducks and geese? What about the habitat quality for wetland breeders other than waterfowl? (Individual, No Address - #B3-142.7.40100.425)

We believe that using glyphosate to remove red-winged blackbird habitat (i.e., cattail stands) as described in the Notice could have lasting impacts on non-target vegetation and a wide variety of species and ecosystem processes. Not only can these wetlands be highly productive ecosystems, they can also be prime breeding grounds for highly valued migratory birds, as well as amphibians that, as a group, are experiencing serious declines worldwide. Destruction of wetland vegetation with a non-specific herbicide such as glyphosate may be tantamount to destruction of the wetland. APHIS should seriously consider this issue in describing wetland impacts and all possible compensation and mitigation for wetland losses in the EIS. (United States Environmental Protection Agency, Chicago, IL - #B1-162.14.25231.405)

Even though APHIS's proposed lethal and non-lethal techniques involve legal applications of registered products (i.e., the avicide DRC-1339, and the herbicide glyphosate), we have objections to the proposal as it was characterized in the Notice. In regard to impacts to wetlands, we believe these impacts would be significant since the application of glyphosate to "cattail stands larger than 10 acres: near sunflower fields would not only remove red-winged blackbird habitat but habitat for many other wetland species." Also, glyphosate could potentially impact a variety of wetland plants, likely destroying wetland functions and values. This could be a significant adverse impact to wetlands. We believe that an EIS would be the most appropriate vehicle for conveying information on significant impacts and possible mitigation to the interested public and the U.S. Department of Agriculture-APHIS decision maker. (United States Environmental Protection Agency, Chicago, IL - #B1-162.2.25231.425)

EFFECTS ON INSECTS

Research suggests that components other than active ingredients in herbicides (e.g., surfactants) can impact insect populations. The EIS should address what impact the application of glyphosate herbicide is expected to have on insect populations. (Minnesota Department of Natural Resources, Saint Paul, MN - #B2-4.10.25231.421)

EFFECTS ON SOIL QUALITY

While glyphosate binds to many soils types, including organic matter and clay materials, making it unlikely to move away from its application site to contaminate water and soil elsewhere, it does have the ability to move into surface water when the soil particles are washed into streams or rivers. High levels of glyphosate have been known to inhibit soil respiration after ten weeks, the compound has been [found in] run-off four months after application and in stream sediment after nineteen months. Chronic binding to soil particles can also inhibit the growth in microorganisms necessary for soil health. Glyphosate has been shown to cause genetic damage in tadpoles as well as to alter communities of sub-soil fungal organisms. (Preservation/Conservation Organization, West Covina, CA - #B3-296.12.41000.412)

Chemical Repellents

Chemical Repellents General

88. Public Concern: APHIS/Wildlife Services should use chemical repellents.

Probably one of the most effective ways to provide a humane long-term solution to bird depredations over a wide area is to make the habitat unattractive to roosting birds through the use of fogging repellents such as Bird Shield and Rejex-it. Recent studies indicate that the fogging agent, known by various names, Rejex-It, Re-Jex-It, etc., (containing dimethyl anthranilate) is extremely effective in preventing crop depredation from roosting birds. Rejex-It has as its principal ingredient the same grape-

like flavoring used in grape soda and bubble gum. With some risk of phytotoxicity, or plant damage, depending on the plant on which it is used, the compound is still harmless to people and animals, and fairly harmless to the environment. It is distasteful to blackbirds and other birds and prevents them from roosting where it has been applied. (Preservation/Conservation Organization, West Covina, CA - #B3-296.16.25240.412)

Following are some humane methods that have proven effective in general bird control programs, which your agency might want to consider:

Chemical Repellents: ReJex-iT, Rejex-It, Re-Jex-It, etc (dimethyl anthranilate) Bird Shield, (methyl anthranilate) and Flight Control (anthraquinone). Used in conjunction with a portion of a sunflower crop, (lure crop) set aside (where feasible) from the main sunflower-producing crop, we believe these repellents could be quite effective.

Methyl anthranilate is currently registered in most states for use as a spray, in water, and as a fog. Anthraquinone functions at both a chemical and a visual repellent for birds because it can be seen by them in the ultra-violet spectrum. It is said to be effective on structures and surfaces where taste-aversion chemicals would not work. (Preservation/Conservation Organization, West Covina, CA - #B3-296.14.25200.700)

Also you should use the repellant used during presidential inaugurations which is successful in keeping the birds away. There is just simply no excuse for slaughtering these poor birds and I won't accept any. Therefore, as a taxpayer I demand that you not murder these poor birds! (Individual, Mechanicsville, VA - #B3-126.1.25000.920)

NON-TOXIC REPELLENTS

If the sunflower seed industry is so concerned about blackbirds eating their crops, why not just find some non-toxic substance that birds in general do not like and spray the crops with it? (Individual, Standish, MI - #B1-125.3.25200.417)

Many years back a program was instituted to prevent deer from eating young tree seedlings. The seedlings were sprayed with egg yolks, which repelled the deer, forcing the deer to go elsewhere for other food sources. Maybe there is some non-harmful substance that could be sprayed on sunflower crops to repel blackbirds. (Individual, Santa Maria, CA - #B3-85.2.25200.417)

Can a bitter but non-toxic spray be applied in "blackbird season" to the seed heads that will make the birds stay away in disgust? (Individual, Oakton, VA - #B3-140.5.20200.417)

Has your office searched for organic deterrents? There are many exceptional products available that are responsible and humane. For more than a year, my husband and I have used a combination of cedar chips and an organic mint-oil treated powder to deter ants from our house. It has worked so effectively that my friends, who formerly relied on commercial, chemical treatments each month, now ask me to eliminate their ants. Using organic deterrents to reduce the presence of birds is not only humane, but safer for us, as well. (Individual, Greenville, NC - #B3-532.5.20200.920)

A REPELLENT SIMILAR TO THE CHEMICAL SPREAD ON GOLF COURSES AND CITY PARKS

Why among the alternatives is there no consideration of using a repellent similar to the chemical that is spread on golf courses and city parks to repel Canadian geese? (Individual, Florida, MA - #B3-339.3.20200.100)

THE REPELLENT USED DURING PRESIDENTIAL INAUGURATIONS

Also you should use the repellant used during presidential inaugurations which is successful in keeping the birds away. There is just simply no excuse for slaughtering these poor birds and I won't accept any. Therefore, as a taxpayer I demand that you not murder these poor birds! (Individual, Mechanicsville, VA - #B3-126.1.25000.920)

89. Public Concern: APHIS/Wildlife Services should allow chemical treatments only under certain conditions.

IF THE TARGETED PLANTS ARE NON-NATIVE, IF THE WATER WILL NOT BE TAINTED, AND IF THE CHEMICAL AGENTS ARE NON-LETHAL TO WILDLIFE

Nor am I positive to the idea to spray pesticides over marshlands because of my concerns over introducing chemical agents that will have a negative effect on the environment, on other species of birds, and wildlife and often to us humans as well. This should only be a viable option if the plants being sprayed are non-native species to begin with, the water will not be tainted, and the chemical agents utilized have been proven to have a non-lethal effect on wildlife. (Individual, Boulder, CO - #B3-109.3.40100.425)

90. Public Concern: APHIS/Wildlife Services should not use herbicides and pesticides.

I use no herbicides, pesticides or fertilizers on my yard in Minnesota. The future of our land and species and even our economy are at stake if we continue to use these. It will greatly affect the ground waters we depend on. I sometimes think in relationship to the land that the people are the biggest pests and predators! (Individual, Chaska, MN - #B3-119.4.43000.412)

Adequacy of Analysis

91. Public Concern: APHIS/Wildlife Services should analyze the effects of chemical repellents.

Chemical repellent may be a portion of the solution, this should be tested to determine possible damage to plant and or animal life which is within the areas of concern. No critter must die for this solution, proper study and use must be closely evaluated. (Individual, Roseburg, OR - #B3-89.7.25231.920)

What will be the long-term effects on all plants and animals from the widespread use of, and persistence of, man-made synthetic chemicals in any damage-management program?

What is the precise list, by species, of wild birds and mammals that have been killed, injured or sickened, by any method, directly or indirectly, during the course of all sunflower protection operations? What is the number of individuals, by species, that have killed, injured or sickened?

What is the precise list, by species, of wild birds and mammals that are expected to be killed, injured or sickened in any new damage-control program. What are the number of individuals of each that are expected to be killed, injured or sickened? (Individual, No Address - #B3-142.18.90100.912)

92. Public Concern: APHIS/Wildlife Services should analyze the effects of pesticides and herbicides.

We have the following concerns regarding potential environmental impacts, including:

What are the impacts to other seed-eating bird species from the proposed use of pesticides and herbicides?

What are the impacts of secondary poisoning on bird species such as hawks, accipiters, falcons, owls, and other raptors?

What are the impacts of secondary poisoning on other predators such as mammals? (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.17.25000.912)

BEFORE USING THEM

Long-term pesticide exposure has been found to impair cognitive function. Previous research already confirms the perilous health effects of pesticides as poisons and carcinogens, but this study (Physicians for Social Responsibility, 1985) reveals the potential for subtle neurological problems associated with chronic exposure. Bodily functions impaired the greatest include: selective attention, working and

associative memory, and verbal fluency and abstraction. A significant portion of the population is exposed to pesticides both in the home and workplace, making the results of this study vital. (Individual, No Address - #B3-142.3.25000.912)

I am particularly concerned about the use of chemicals such as DRC-1339, glyphosate, Avitrol, Bird Shield repellent, and Rodeo. Such substances always have far-reaching harmful effects on wildlife, plants, and the overall environment. I urge that their use be forbidden. (Individual, Sunnyvale, CA - #B3-113.4.25000.425)

I am deeply troubled by the proliferation of man-made synthetic chemicals in the environment. Even a cursory review of the Environmental Protection Agency's Toxics Release Inventory reveals that enormous quantities of harmful pollutants have been released into our water, soil and air. In addition, many new man-made chemicals are introduced into the environment every year.

Little testing is done to determine the environmental impact of individual synthetic chemicals. Even less testing is done to determine the effects of combinations of these chemicals and there are potentially millions of different combinations. It is unsettling to understand that no one seems to know what the effects are. (Individual, No Address - #B3-142.2.25240.920)

We have the following concerns regarding potential environmental impacts, including:

What testing, if any, has been done on the proposed pesticides and herbicides? What are the results of that testing? Have these pesticides and herbicides been tested in the laboratory, or are they being "field tested"? In other words, how much credible data has been gathered on the impacts to human beings and wildlife of these pesticides and herbicides? (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.18.25000.912)

Use of Avitrol, Bird Shield Repellent

93. Public Concern: APHIS/Wildlife Services should use Avitrol.

I would like to know why we can't use Avitrol to help against Blackbirds. Also why can't we get help in spraying cattails and other blackbird resting areas. They should be able to find something that drives blackbirds away. We have whole fields that blackbirds have eaten up. (Business, Harvey, ND - #B3-716.2.25000.417)

94. Public Concern: APHIS/Wildlife Services should not use Avitrol.

BECAUSE IT IS INEFFECTIVE AND INHUMANE

Avitrol and other frightening agents—these appear to have been ineffective and also inhumane. (Individual, Folsom, CA - #B3-456.6.25240.920)

It is noted in your scoping document that Avitrol (4-aminopyridine) is currently in use by a few sunflower producers. For a number of reasons, not the least being the cruelty involved in the use of this product, Avitrol should be banned outright. Where used in blackbird control, according to the [HSUS] Humane Society of the United States, this poison has been found to be both ineffective and inhumane. HSUS states that the poison is an acutely hazardous restricted-use pesticide which, although it has been labeled for use as a bird repellent, in reality kills many birds, including non-target species protected by the Migratory Bird Treaty Act. (Preservation/Conservation Organization, West Covina, CA - #B3-296.4.25240.419)

I also do not want to have the "frightening agent" Avitrol used on the blackbirds. This "non-lethal" method of control frightens some blackbirds by slowly poisoning other blackbirds, whose dying distress calls scare the other birds away. I am definitely against such a cruel method of control. (Individual, Eugene, OR - #B3-76.5.25240.700)

Avitrol—what a hideous death for the birds. Have you no heart? (Individual, Mendocino, CA - #B3-118.5.25240.700)

BECAUSE OF ITS POTENTIAL EFFECTS ON NON-TARGET ANIMALS

Avitrol kills animals other than blackbirds and is ineffective (Individual, No Address - #B3-454.3.25240.425)

In addition to directly killing seed-eating bird species and shorebird species, the poison would also indirectly kill predatory birds, mammals, and reptiles. These secondary victims include predatory birds such as Loggerhead Shrike (in serious decline), owls, hawks, falcons, accipiters, and Turkey Vultures, mammals such as coyotes, and reptiles such as snakes. Such predators are attracted to dead or dying birds. As noted in the Scoping Document, many of the poisoned birds take hours or days to die and emit distress calls. Contrary to “scaring off” other birds as incorrectly stated in the Scoping Document, these signals actually serve as an invitation to predators, who instinctively are attracted to just such signs of dying and death. Thus, many more birds and mammals than the “intended victims” will be poisoned indirectly as a result of eating birds that were directly poisoned. (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.8.25240.419)

Avitrol is inconsistent in reducing damage, is a harmful chemical added to the environment, and has the potential to harm non-target birds. (Individual, Graham, NC - #B3-149.1.25240.419)

95. Public Concern: APHIS/Wildlife Services should use Bird Shield Repellent.

I strongly object to the current proposal to poison millions of blackbirds

There are viable alternatives to this poisoning, including Bird Shield and other more humane and reasonable deterrents. Avicide is unacceptable, and I encourage you not to follow through with this plan. (Individual, No Address - #B3-279.1.25200.417)

BECAUSE IT IS SAFE AND EFFECTIVE

The economic impact of Blackbird damage to the sunflower crop has created an average loss on my farm of \$25,000 in the last four years. That is a good share of the farm profit. The use of “Bird Shield” seems to hold the greatest promise. Please research and use the product on blackbirds. (Business, Wimbledon, ND - #B3-743.2.25240.900)

Bird Shield, another product with a grape-juice or grape-skin component, (methyl anthranilate) has been found to be as effective as dimethyl anthranilate but less expensive to produce. The formulation can be mixed in water for air-blast applications, and, reportedly, is effective for a longer period of time than Rejex-It, and also has a less risk of phytotoxicity.

Bird Shield has been tested on commercial cherry orchards (Washington State University) with very promising results (impressive increases in productivity as bird depredations were decreased, with no affect to the taste or quality of the fruit). (Preservation/Conservation Organization, West Covina, CA - #B3-296.16.25240.412)

PROVIDED THAT RESEARCH SHOWS IT TO BE SAFE

We (For The Animals) favor the use of repellents such as Bird Shield for dispersing roosting blackbirds in cattail marshes, or other habitat, with the provision that sufficient study be undertaken, or has been undertaken, to assure that neither target nor non-target birds will be harmed and that the environment will not be compromised. (Preservation/Conservation Organization, West Covina, CA - #B3-296.20.25240.425)

96. Public Concern: APHIS/Wildlife Services should not use Bird Shield.**BECAUSE IT IS TOXIC**

According to the integrated Adaptive Management Program alternative, even though Bird Shield Repellent "has not been thoroughly evaluated for use by WS [Wildlife Services] as an operational tool," "producers would be made aware of this potential product." Is WS going to expedite the use of this product, even as the NWRC [National Wetlands Research Center] studies it (efficacy of Bird Shield Repellant as a Roost Dispersal Agent) for efficacy, effects on non-target birds, and costs/benefits? Bird Shield is another toxic, non-targeted environmental chemical which should not be used. (Individual, Graham, NC - #B3-149.4.25240.920)

97. Public Concern: APHIS/Wildlife Services should explain why Avitrol and Bird Shield are considered to be non-lethal.

On what grounds is the use of Avitrol and Bird Shield Repellent by growers labeled as "non-lethal" (Sunflower Protection Scoping Document, page 10)? How was this conclusion reached? (Individual, No Address - #B3-142.17.20320.912)

Adequacy of Analysis – Use of Avitrol, Bird Shield Repellent**98. Public Concern: APHIS/Wildlife Services should analyze the use and effects of Bird Shield.**

Please indicate what the active ingredient of Bird Shield (registered trademark) is, how it works, what target/non-target animals could be impacted, how long does it remain active, etc. (Individual, Omaha, NE - #B3-392.20.25240.419)

Bird Shield repellents—we believe that further assessment of this method is needed to see whether it is effective and how it affects non-target birds and other species. (Individual, Folsom, CA - #B3-456.7.25240.419)

Very troublesome is the inclusion in this alternative of a newly registered product that has not been evaluated for this purpose (Bird Shield). Experimental use of chemicals should not be included in this EIS. Why is this being included? What is the safeguard against abuse? What are the potential impacts of this product on the target species? What are potential impacts on non-target species? What species might be affected? Why is this not included in the scoping document? (Individual, Iron River, MI - #B3-112.4.25240.912)

Other Non-Lethal Methods**99. Public Concern: APHIS/Wildlife Services should use non-lethal methods to control red-winged blackbirds.****ELECTRONIC BIRD DISPERSAL SYSTEMS**

Other methods that should be considered for bird control are electronic bird dispersal (EDB) systems and/or electronic bird repellers. Electronic bird dispersal systems are advanced-technology control units that use audio and visual dispersal methods to provide bird management for large, open areas. EDB units vary in size and capability in that single units are capable of dispersing birds from areas ranging in size from 100 ft. in diameter to up to 5 acres. Adding additional speakers and detection methods can add to the capability of single units. Combined, these units are capable of managing very large areas. (Preservation/Conservation Organization, West Covina, CA - #B3-296.17.20200.912)

Bird Gard AVA is one example of an electronic bird repeller. This repeller generates synthesized bird species distress cries that are electronically recorded on a microchip.

The operation is automatic, and the unit may be left unattended. The distress cries repel many types of flocking birds and are considered effective against many wild birds, including blackbirds. (Preservation/Conservation Organization, West Covina, CA - #B3-296.18.25200.417)

There must be a way to protect the sunflowers as well as the lives of the blackbirds—since netting is not a practical solution and the poisoning, etc., are unconscionable methods of resolving this dilemma, please consider having speakers installed throughout the area, possibly on the perimeters and determine through trial and error how many would be needed to distract the blackbirds? Having loud music, sound effects of other birds or animals who are disturbing to them, etc., may frighten them away. (Individual, Redwood City, CA - #B3-414.2.25200.920)

I know that noise devices are successfully used on starlings and birds around airports. (Individual, Atlanta, GA - #B3-151.4.20200.417)

We propose that any combination of the previously suggested methods of bird depredation control be employed, but believe that electronic bird dispersal systems, electronic bird repellants, and fogging repellents would be quite effective, especially if used with a variety of scaring techniques. In fact, we agree with those experts who believe that electronic bird dispersal or repellents units—Bird Guard, Bird Shield, etc.—often represent the only practical, long-term solution for humanely dispersing large numbers of birds in open terrain. (Preservation/Conservation Organization, West Covina, CA - #B3-296.21.20200.417)

BIOENGINEERED DISEASE RESISTANT PLANTS OR INSECTIVORES

Looking at alternative solutions (such as Bioengineering of disease resistant plants, or encouraging insectivores by providing habitat and housing) to disease and insects would prove more beneficial than simply killing off two million birds. (Individual, Easton, PA - #B3-137.3.20200.417)

Have farmers grow sunflowers that are mature and can be harvested before the birds migrate. Spray for insects and weeds, grow disease resistant types—teach them how to harvest the product. (Individual, No Address - #B3-505.4.20200.903)

Losses due to insects, weeds, disease and combine harvest are cited as other causes for crop loss. Can these losses be further reduced, instead of focusing on removing blackbirds, which are native/natural to this region (as opposed to monocrops of sunflowers)? Perhaps more efficient combine harvest methods in concert with targeted weed control and disease resistance strains could reduce the total damage to sunflower crops to within the targeted goals. (Individual, Omaha, NE - #B3-392.6.20200.903)

INTEGRATED PEST MANAGEMENT

I am also a lifetime member and a past president of the Lane County Master Gardeners. An important part of my training and of my own gardening practice has been the Integrated Pest Management (IPM) to refrain from harming as many plants, animals, and microorganisms as possible in the effort to help our gardens. I would like to see such a philosophy applied to the problem of blackbird damage to sunflowers. (Individual, Eugene, OR - #B3-76.2.20200.425)

STERILIZATION METHODS

Please abandon plans to poison 6 million blackbirds. This is totally inhumane and outrageous. There must be better ways to control bird populations, perhaps birth control? For some ways go to PETA-online-org (Individual, No Address - #B3-104.1.20200.100)

I prefer an alternative using sterilization, methiocarb and replanting the blackbirds' preferred food around swamps and fields of sunflowers. (Individual, Chaska, MN - #B3-119.1.20200.401)

Please find more humane alternatives in general, like sterilization or relocation. (Individual, Rochester, NY - #B3-511.1.20200.700)

DOGS

Is there a way to scare the birds off by hiring dogs to chase them away as they do with geese on golf courses? (Individual, Oakton, VA - #B3-140.5.20200.417)

Here are some questions/issues I would like addressed in the EIS: I would like to see studies completed to access the effectiveness of using border collie patrols. The border collies could be used only seasonally in areas of blackbird damage. This option might be more cost-effective if teams of border collies are shared in the various communities. (Individual, Grandview, MO - #B3-462.5.20200.417)

CHANGING NESTING HABITAT

A plan with more forethought would be one that addresses the nesting capabilities of the Red Wing Blackbird. Rather than killing the birds outright, make an effort to reduce their ability to nest. (Individual, Grafton, WI - #B3-316.2.25000.417)

TRAPPING AND SELLING

I wanted to express my desire for your agency to come up with a more humane and species-specific way to try and control the blackbird population. How much better are you if you kill non-targeted species of birds and wildlife? I don't understand. Not only that, but to use such a cruel method as poisoning. There must be a better way and I hope that you work to find it. Has anyone attempted trapping? (Individual, Panama City, FL - #B3-144.1.20300.920)

I urge you to not consider such a thing and find other ways—perhaps trapping them and selling them to bird breeders and zoos around the world and using the money for wildlife conservation would be a much better alternative. (Individual, No Address - #B3-347.2.20200.417)

If it is determined that killing the blackbirds is a “necessity” (God forbid) and the lesser of two evils, a non-toxic solution should be found. Would massive trapping using cannon nets work? (Individual, Oakton, VA - #B3-140.6.20350.417)

MISCELLANEOUS NON-LETHAL CONTROL METHODS

Following are some humane methods that have proven effective in general bird control programs, which your agency might want to consider:

Scaring Devices (used randomly along with other frightening stimuli.) Some of these are:

Flagging (with the “flags” set out in fields at a density of about one per acre.)

Mylar balloons, filled with helium, staked at the end of 15 or 20 foot long lines, situated in a field, at a 50 to 100-foot intervals.

Helikites which combine both balloon and kite-like features and bounce erratically with the wind.

Scare Balloons. HSUS (the Humane Society of the U.S.) states: “Commercially available ‘Scare-eye’ balloons are designed to use a behavioral concept called a ‘supernormal’ stimulus. By using super-enlarged and exaggerated ‘eye’ spots, visual stimuli are created that have a strongly deterring effect. Like any other device dependent on creating a frightening stimulus, however, effectiveness can diminish with time and frequency of presentation.”

Scarecrows that automatically inflate on a periodic basis to intimidate birds. (Preservation/Conservation Organization, West Covina, CA - #B3-296.15.25200.700)

Other methods may be used to reduce damage by blackbirds, including hazing, propane exploders, pyrotechnics, decoy traps, and shooting. Continued simultaneous use of these methods in the local areas

most affected by blackbirds should be ongoing, with continuing additional research into long-term effects. (Individual, Milwaukee, WI - #B3-341.4.25200.109)

Lethal Methods

Lethal Methods General

Lethal Methods – General Considerations

100. Public Concern: APHIS/Wildlife Services should use lethal methods to control red-winged blackbirds

Attempts to control blackbird populations through non-lethal methods (lure crops, pop-up scarecrows, propane cannons, low-level airplane passes) have met with little success, primarily because they are used as frightening devices and do little to reduce actual population numbers. (Agriculture Association, Jamestown, ND - #B3-270.3.25200.417)

Blackbirds have completely wiped out sunflower fields, nothing can be done to chase these birds out of a sunflower field. There are thousands in a flock. Blackbird population needs to be reduced. (Business, Tappen, ND - #B3-690.2.25000.417)

I have tried scaring blackbirds with propane boomer and shotguns, but it hasn't worked!

I have had terrible losses in some of my fields of sunflowers. (Business, Steele, ND - #B3-605.2.25200.912)

The majority of the sunflower acres are seeded in the central part of the state, which also happens to be the central migratory route for blackbirds. It is estimated these migratory birds cause \$5-10 million dollars of damage to sunflower production every year. Through the years, North Dakota sunflower producers have tried several methods of control, including firearms, Avitrol, and propane cannons. These methods have had little success in overall control of blackbirds because they are used more as frightening devices and do little to reduce blackbird numbers. The use of Rodeo has also been found to be an effective tool in eliminating cattails as blackbird roosting areas; however, it does little to reduce overall numbers of blackbirds. North Dakota producers have become frustrated because there are no methods available to them to reduce the number of blackbirds, which would ultimately reduce the damage done by the birds. (North Dakota Department of Agriculture, Bismarck, ND - #B1-98.3.20100.100)

BECAUSE NON-LETHAL METHODS ARE INEFFECTIVE

For the last ten years, the South Dakota Oilseeds Council has financially supported passive control efforts in South Dakota. We've supported everything from passage of legislation that allows for the use of "boomer guns" by producers, to payment for planes to fly by affected fields, to the spraying of cattails to affect blackbird nests. And while passive control efforts that seek to disperse blackbirds help, they have not significantly lessened the damage incurred by our producers. Additionally, such efforts are cash and labor intensive and without any real demonstrable results do not lend themselves to long term support by producers, government or any other entity that is compelled to pay for such efforts. (Agriculture Association, Pierre, SD - #B1-84.1.25200.911)

BECAUSE BIRD SHIELD IS INEFFECTIVE

Every year blackbirds cost farmers thousands of dollars. We have tried Bird Shield and it does very little. Blackbirds migrate and so when you chase one group away another settles in. By the time they are done 1/2 of your field is eaten or wasted! Black birds have no use and hurt our livelihood. Please do all you can to help our cause. (Business, Java, SD - #B3-665.2.25000.905)

101. Public Concern: APHIS/Wildlife Services should review the appropriateness of the red-winged blackbird poisoning program as an effective management tool.

I request that you review the appropriateness of all blackbird-poisoning programs throughout the country currently being conducted or proposed by APHIS. As the Audubon Society reminded you in their recent letter, APHIS' own studies in the mid 90s proved poisoning to be an ineffective management tool. But beyond the matter of efficacy, the more important consideration is the impact on non-target species, the potential of disease transmission through carcasses and the sheer cruelty involved in this method. I urge you to withdraw from the process as your only recommendations appear to be of a lethal and irresponsible nature. (Preservation/Conservation Organization, Framingham, MA - #B3-276.3.25300.920)

We request that the Environmental Assessment fully and objectively evaluate the following issues in greater depth than was the case in the February, 2000 Pre-decisional Environmental Assessment: the need for the poisoning program; the likely effectiveness of poisoning given that blackbirds may be so abundant that their numbers cannot be controlled in this manner; likelihood of effectively predicting which staging areas will be associated with substantial springtime damage; and the potential non-target impacts of the proposed program. (Preservation/Conservation Organization, Washington, DC - #B1-102.2.25300.425)

102. Public Concern: APHIS/Wildlife Services should not use lethal methods to control red-winged blackbirds.

BECAUSE LETHAL METHODS HAVE NOT BEEN SHOWN TO BE EFFECTIVE

I am writing to oppose the poisoning of red-winged blackbirds in the South Dakota sunflower fields. There is historical precedence, which shows that previous methods of controlling the birds had little effect on the sunflower crop. (Individual, Hanover, PA - #B3-349.1.20200.412)

Poisoning of these blackbirds can never effectively protect all sunflowers from damage, unless all of these birds are destroyed. How can we destroy a species of birds just to assure the production of sunflower seeds for commercial bird feed or human consumption? (Individual, San Clemente, CA - #B1-141.2.25300.417)

BECAUSE OTHER OPTIONS ARE AVAILABLE

We feel that killing is not the only option out there. Our country is full of brilliant people and surely, there are other solutions that can be reached. It would be beneficial to the sunflower industry to spend the money to find other solutions. Is it possible for the timing of sunflower seed harvesting to be changed to before the blackbird migration begins? Is the growing of sunflower seed increasing the population of blackbird species? (Individual, No Address - #B3-544.3.20200.912)

There are any number of solutions that can be made to solve the issue that do not include poisoning of wildlife. If euthanization of the birds must be the outcome, please consider an alternative method so that these creatures do not have to suffer. (Individual, Columbus, OH - #B3-81.2.25000.417)

BECAUSE THE PROPOSAL IS BASED ON FAULTY SCIENCE AND KILLING

I am writing to oppose the proposed blackbird culling. The proposal seems to be based on faulty science and killing these precious animals will not solve anything long-term. (Individual, Staten Island, NY - #B1-167.1.25300.912)

ONLY AS A LAST RESORT

Because of the unnecessary pain and suffering it causes, poisoning should be one of the last fatal forms of "management" for controlling "pest" species, and should only be considered after all other attempts to

remedy the situation in a more humane way have been made. (Individual, Union, NJ - #B1-67.2.20000.700)

103. Public Concern: APHIS/Wildlife Services should amend Alternative 2 to discontinue all lethal methods.

Out of the Proposed Alternatives considered in the EIS we prefer Alternative 3, which would be to implement current state, private, and sunflower producer damage management action with no Wildlife Services Programs. However, our strongest preference would be to amend alternative two (Integrated Adaptive Management Program) to discontinue all lethal damage control methods, especially the use of DRC-1339, and to focus instead on non-lethal methods such as cattail habitat management. This should be done with the understanding that all methodology is to be reviewed every five years to determine the short and long-term impacts on the environment and their success rates in controlling crop damage. Other concerns to address with this amended methodology are the corresponding increases in biodiversity with the use of glyphosate and the long term impacts these species have on crops, as well as the long term effects of the ongoing use of glyphosate on the ecologic health of the wetlands that have been treated. (Business, Bloomington, IN - #B3-26.4.20100.920)

104. Public Concern: APHIS/Wildlife Services should drop its permit request to the U.S. Fish and Wildlife Service to poison red-winged blackbirds.

We urge you to drop your request to the U.S. Fish and Wildlife Service for a permit to poison blackbirds. (Individual, Enderlin, ND - #B1-163.2.11130.417)

105. Public Concern: APHIS/Wildlife Services should explain how use of lethal methods is considered to be "No Action."

The "No Action Alternative" includes lethal control of blackbirds. Please explain how lethal control is considered to be "No Action." (Individual, Iron River, MI - #B3-112.2.20110.100)

Lethal Methods – Legal Considerations

106. Public Concern: APHIS/Wildlife Services should not use lethal methods to control red-winged blackbirds.

BECAUSE POISONING BLACKBIRDS IS ILLEGAL

Poisoning migrating birds is illegal and no exceptions should be made to the law that protects them. (Individual, Menlo Park, CA - #B1-126.2.25300.300)

In the poisoning business . . . the unwarranted consequences of the ancillary loss of unlisted migrating birds are without question unlawful and unnecessary. (Individual, Sioux Falls, SD - #B1-30.16.25300.425)

It's illegal for individuals to poison birds and animals, and a taxpayer-funded agency should not have this right either. (Individual, No Address - #B3-514.3.25300.300)

Poisoned rice creates a horrible, torturous death for the birds, which under local animal cruelty laws would qualify as an illegal act. (Individual, Greenville, NC - #B3-532.2.25300.417)

BECAUSE POISONING BLACKBIRDS IS ILLEGAL UNDER THE MIGRATORY BIRD TREATY ACT

The current policy is a failed one because, under the pretense of "research" to get around the Migratory Bird Treat Act prohibition on killing protected bird species (which include blackbirds), the U.S. Department of Agriculture has already poisoned untold number of blackbirds. (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.3.25300.101)

The Federal Government and world community recognize the value of migratory birds. This is evident in the establishment of the Migratory Bird Treaty Act. Actions proposed in the scoping document to this EIS directly threaten populations of migratory birds. There is no scientific evidence that killing migratory birds or destroying their habitat will reduce sunflower crop damage to no more than five percent in individual sunflower fields. Therefore, we believe these actions would be a violation of the intent of the Migratory Bird Treaty Act. (Individual, Phoenix, AZ - #B3-86.6.25300.920)

The intentional poisoning of migratory birds has been illegal under the Migratory Bird Treaty Act for almost a century. The U.S. Department of Agriculture is attempting to carve out an exception for blackbirds, whereby it would be legal to poison blackbirds to protect sunflower crops. We are opposed to this blatant attempt to weaken the Migratory Bird Treaty Act. First, there is no way to limit the "intended victims" to blackbird species. Therefore, the premise of the project is scientifically defective and the project is scientifically unsound. Second, all seed-eating bird species and shorebirds that migrate through North Dakota and South Dakota would become victims because they too, would be attracted to the sunflower crops and eat the poisoned bait [as well as] the insects and crustaceans in the soil where the poisoned bait is placed. Third, indirect or secondary poisoning would result in the killing or injuring predatory birds such as Loggerhead Shrike, owls, hawks, Turkey Vultures, and other raptors, mammals, and reptiles—any predatory species that would eat a dead or dying bird. Fourth, the long-term impacts of the poisons on both humans and wildlife are not known. Fifth, non-lethal crop-protection alternatives, including financial subsidies, are available and should be implemented. The most drastic step—intentional poisoning of bird species that are protected by the Migratory Bird Treaty Act—is the current policy. That should be stopped immediately and other benign alternatives should be used instead. (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.25.20200.300)

The May 21, Federal Register notice mentions that DRC-1339 has been used on red-winged blackbird flocks in Louisiana, North and South Dakota and Texas. We are concerned that the Migratory Birds Treaty Act may have been violated by such programs. (Preservation/Conservation Organization, Dallas, TX - #B2-10.3.25310.300)

TO COMPLY WITH THE MIGRATORY BIRDS CONVENTION

The MBC [Migratory Birds Convention] also has a place in this discussion. The control methods proposed clearly have the potential to adversely affect protected migratory bird species during their spring migration. Of particular concern are the use of DRC-1339 and glyphosate to induce mortality in birds migrating to Canadian breeding grounds, either through direct toxicological effect or through disruption to important staging habitat. It would seem that any permitting of the take of migratory birds under the MBC would have to be justified under the provisions of Article VII of that Convention, in which the species taken must be a species causing damage. (Canadian Wildlife Service, Ottawa, Canada - #B2-7.2.25000.300)

Lethal Methods – Trust and Integrity Considerations

107. Public Concern: APHIS/Wildlife Services should not use lethal methods to control red-winged blackbirds.

TO MAINTAIN PUBLIC TRUST IN GOVERNMENT VALUES

I don't think that a government agency poisoning wildlife sends the right message to the citizens of the United States about the values of the government. Surely there is some better way to control blackbird damage than using poison. (Individual, Atlanta, GA - #B3-151.1.25300.103)

TO MAINTAIN CREDIBILITY WITH CONSERVATION ORGANIZATIONS

How will this poisoning effort affect our credibility with our "Partners in Flight" partners in other nations such as Mexico and Canada? (Preservation/Conservation Organization, Rapid City, SD - #B1-105.3.25300.112)

BECAUSE LETHAL METHODS ARE SUGGESTED ONLY TO PACIFY AGRICULTURAL LOBBYING GROUPS

Studies have shown that poisoning blackbirds is not effective, so why use an ineffective, indiscriminate, method as a "feel-good" method to pacify the agricultural lobbying groups! (Individual, No Address - #B3-165.1.11200.417)

*Lethal Methods – Public Involvement/Support Considerations***108. Public Concern: APHIS/Wildlife Services should not use lethal methods to control red-winged blackbirds.****BECAUSE TAXPAYERS OPPOSE IT**

As United States citizens, we are the legal owners of the wildlife in this country. The government has a duty to protect our wildlife, rather than slaughter it for commercial interests. (Individual, Phoenix, AZ - #B1-21.3.46000.103)

I also realize this is taxpayer-funded government agency that has been engaged in the poisoning and slaughter of wildlife in the United States for many years; as a taxpayer I highly object to the U.S. Department of Agriculture's actions. As a taxpayer I highly object to such blatant damage to wildlife. (Individual, Kensington, MD - #B3-175.1.46000.414)

We . . . express our deep concern at the U.S. Department of Agriculture's use of taxpayer-funds to kill millions of red-winged blackbirds in North Dakota and South Dakota. It appears that this action is being taken to satisfy the large farm producers of various types of seed. It can serve no other intelligent means. (Individual, No Address - #B3-179.1.25300.920)

I would like you to seek creative alternatives to killing. So, please do not waste my tax money on killing valuable wild life. (Individual, Staten Island, NY - #B1-167.4.20300.913)

BECAUSE BIRD WATCHERS OPPOSE IT

The popularity of bird watching and urban feeding has grown because it is one of the few things the average person can do, to enjoy the simplest and most fascinating animal that everyone can find, even in their backyard. How many bird enthusiasts would be horrified to know that millions of blackbirds, as well as yellow-headed blackbirds, doves, pheasants, barn owls, finches, junco, hawks, falcon and cats have been, and would continue to be killed, just so a two percent crop damage might be avoided. (Individual, Edgerton, WI - #B3-371.3.70200.920)

Personally, I do not want these animals killed. Bird watching is a multi-million dollar business, and preserving more habitat for these birds would be wise. (Individual, Staten Island, NY - #B1-167.3.80110.920)

This program affects me, as I am a consumer of sunflower products, in my own food and as bird feed. I spend a considerable amount of time, travel, and money in the pursuit of birding. (Individual, Milwaukee, WI - #B3-408.10.80110.602)

Your intended actions will not only effect birds, it will effect all of the tax payers-whose funds you intend to use-that enjoy watching and feeding some of the most beautiful of God's creations. (Individual, No Address - #B3-179.3.80110.913)

109. Public Concern: APHIS/Wildlife Services should encourage students to brainstorm ideas.**TO AVOID USING LETHAL METHODS**

I suggest having grade-school kids across the country brainstorm ideas for you; the kids of today are our future and they have some surprising ideas sometimes. (Individual, Belen, NM - #B3-352.2.20200.100)

I challenge you to think outside of the box on this problem. Why not hire a student in economics, or environmental studies, or social psychology, to work on this, too? The last thing the world needs is another study on landscape dynamics. (Individual, Madison, WI - #B3-734.8.20200.100)

*Lethal Methods – Environmental Considerations***110. Public Concern: APHIS/Wildlife Services should use lethal methods to control red-winged blackbirds.****TO CONTROL RED-WINGED BLACKBIRD POPULATIONS**

Population control would be a useful option (poison). (Business, Granville, ND - #B3-684.2.25300.417)

I have been farming for over 40 years and the blackbirds are not in control of what and where you can plant. I believe they are doubling in population each year. A poison control is the only answer. (Business, Selby, SD - #B3-742.2.25300.417)

111. Public Concern: APHIS/Wildlife Services should not use lethal methods to control red-winged blackbirds.**BECAUSE IT WILL UPSET THE ECOLOGICAL BALANCE**

A mass killing of blackbirds will upset the ecological balance of the area with unpredictable and potentially devastating repercussions. (Individual, Chapel Hill, NC - #B3-94.2.25300.400)

Please do not poison six million red-winged blackbirds. Think of what that will do to the ecosystem! (Individual, No Address - #B3-553.1.25300.400)

To randomly poison the blackbirds is dangerous because cross-poison could occur and more importantly, we do not want to substantially change the number of blackbirds because once their number decreases, the ecosystem is changed. (Individual, Minneapolis, MN - #B3-20.2.25300.425)

To kill off over six million red-winged blackbirds would impact insect population, animal population, and other avian life. Insect population would climb dramatically causing farmers to increase insecticides. Animal population that feeds on small birds would die off. Raptors which feed on small birds would also be affected. (Individual, Chicago, IL - #B3-44.2.25300.425)

BECAUSE IT THREATENS BIODIVERSITY

Poisoning kills more species than just the “intended victims”, blackbirds. Therefore, biodiversity is threatened under the current policy. (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.6.25300.413)

Avoid the use of bird poison or other controls that kill birds and disrupt the region's biodiversity. (Individual, Omaha, NE - #B3-392.17.25300.413)

BECAUSE OF EFFECTS ON SOIL QUALITY

I am concerned about the effects on soils of undissolved poisons. (Individual, No Address - #B3-142.11.25300.411)

BECAUSE OF EFFECTS ON WATER QUALITY

Baiting the areas where the target birds tend to congregate with poison has the potential to reach . . . water supplies. (Individual, Grandview, MO - #B1-90.1.25300.425)

If numerous blackbirds are poisoned, what happens to the water quality in the marshes as their bodies decompose? Presumably dead blackbirds will fall into the marshes near their roost. (Individual, Saint Paul, MN - #B3-19.1.25300.403)

To spread various poisons, and ignore the intrinsic value of the birds to other people is, egocentric. Besides that, your report admits that other valuable species are killed along with the birds. Poison also threatens the water table, and some of it might be absorbed by the sunflowers making it lethal for children or the elderly to eat them. (Individual, Cave Creek, AZ - #B3-24.2.25300.425)

BECAUSE OF EFFECTS ON WILDLIFE

Other alternatives must be looked at in order to properly address the issue at hand. Spreading poison-laced rice will have adverse affects on the environment as well as the wildlife. (Individual, Monroe Township, NJ - #B3-565.2.20200.920)

BECAUSE HUMANS ENCROACHED ON WILDLIFE HABITAT

Please do not go through with this planned killing. Three billion songbirds are lost every year due to man's encroachment into what little wild America is left. I would rather keep the birds and do away with the sunflowers. It is the fault of the growers that there are so many birds. (Individual, No Address - #B3-268.1.25300.419)

I urgently request that you stop this chemical poisoning of birds and other wildlife. There are much better means of dealing with this problem. Man created the problem—man should fix the problem. Don't blame the birds! (Individual, Delran, NJ - #B3-278.3.25300.425)

BECAUSE OF EFFECTS ON NON-TARGET AND ENDANGERED SPECIES

Putting pesticides into the environment can also pose harm to dozens of other bird species, including those federally listed as threatened and endangered. There is a presence of about 68 other species of grassland songbirds in the proposed poison-baited areas, including the bobolink, grasshopper, sparrow, Harris' sparrow and Le Conte's sparrow, among many others. (Individual, Duluth, MN - #B1-99.3.25300.419)

Putting poisoned bait into fields to kill blackbirds also kills dozens of other bird species that will eat the bait, including but not limited to loggerhead shrike (in serious decline), dickcissel (in serious decline), meadowlarks, horned larks, bobolinks (in serious decline), indigo bunting, goldfinch, field sparrow, and lark sparrow. Shorebirds are frequently found in wet or muddy sections of unplowed agricultural fields and may indirectly ingest poison that has spread to the insects they eat. In addition, raptors (hawks, falcons, and accipiters) will eat the dead or dying birds and they, too, will die from the poison, albeit indirectly. Thus, more birds than the intended "victims" will be poisoned. (Individual, Glencoe, MO - #B1-163.5.25300.419)

Troubling is the notion that one can target one type of bird with poison bait. I put out cat chow for strays and I can tell you that opossums and raccoons do not read the label and walk away. If you poison blackbirds, you poison all the other birds in the area, as well as deer and potentially other animals. (Individual, Renton, WA - #B1-69.1.25300.425)

The proposed plan for the poisoning of red-winged blackbirds should be denied for the following reasons:

These birds are prey for non-target wildlife. The concern here lies in the fact that the peregrine falcons take red-winged blackbirds as one of the many species of birds for their prey. The peregrine falcons were driven to the brink of worldwide extinction from the use of DDT for the eradication of insects. The poison was absorbed from the birds that ate the sprayed insects and plants then it was stored in the peregrine's fat tissue interfering with the production of calcium for egg formation. This can happen, again! (Preservation/Conservation Organization, Harper Woods, MI - #B1-127.1.25300.416)

I was just made aware that the USDA Wildlife Services will be poisoning endangered species. How can this be possible? Aren't endangered species supposed to be protected, especially by the USDA? It would seem to me that the chemicals would not only kill the red-winged blackbirds but numerous other kinds of wildlife. Therefore I cannot comprehend that such an act would take place.

If the information I have received is correct, I certainly hope someone will put a stop to this. I would appreciate any further information you can give me on this situation. (Individual, Saylorsburg, PA - #B3-294.1.46300.416)

BECAUSE THERE WILL BE A "CHAIN OF DEATH" REACTION

The predator that dies from eating an animal killed by poison will in turn attract other predators who if it eats the dead predator will in turn be poisoned and could also die in a chain of death. (Individual, Brookings, OR - #B3-385.1.25300.419)

BECAUSE BIRDS EAT SUNFLOWER SEEDS BASED ON BIOLOGICAL IMPERATIVE

Just who is the enemy here? The birds are following biological imperative, they have little choice in the matter, and the farmer is enticing the birds with the seed crops. But the birds pay for it with their lives. That's not fair. In fact, I see it as cowardly and exploitative. Once again, we humans try to control and thwart natural processes leaving degradation, destruction, and suffering in our wake. (Individual, Mendocino, CA - #B3-118.1.25300.700)

I urge to stop the planned poisoning of blackbirds. What do you expect them to eat? Last time I checked, birds ate seeds, and that includes sunflower seeds!! Or perhaps now the U.S. Department of Agriculture will try to also change the eating habits of birds and turn them [into] carnivores! (Individual, No Address - #B3-548.1.10200.417)

BECAUSE IT COULD INCREASE RODENT INFESTATIONS THAT WOULD ALSO AFFECT SUNFLOWERS

Poisoning of the blackbirds can also [cause] secondary poisoning of raptors and owls, not to mention mammals that would feed upon a dead or dying blackbird. This could lead to increased rodent problems that would take its toll on the sunflowers. (Individual, Easton, PA - #B3-137.2.25300.419)

UNTIL MORE DATA ON THE EFFECTS OF POISONING ON THE ENVIRONMENT IS COLLECTED

The broad scope of unanswered ecological questions that the current and proposed research projects will attempt to address is indicative that not enough information is known about the deleterious effects of poison baiting on population, community, landscape, and ecosystem levels. Until more data are available, current operational programs that include lethal methods should be discontinued, and the proposed integrated adaptive management program should not be considered. (Preservation/Conservation Organization, Saint Louis, MO - #B3-465.5.40100.100)

112. Public Concern: APHIS/Wildlife Services should consider that use of lethal methods will cause red-winged blackbird populations to rebound.

What purpose does the killing accomplish? To compensate for the drop in population of blackbirds, nature will increase fertility rates. If nothing is done, the blackbird population should remain stable and whatever the birds are eating now won't change that much. (Individual, Chagrin Falls, OH - #B1-3.1.40100.912)

This [lethal] proposal will not affect the root of the problem, because red-winged blackbirds can quickly replenish their numbers with their high reproductive rate and the abundance of breeding habitat. (Individual, Melrude, MN - #B3-373.5.40100.417)

Slaughter will only trigger an ongoing population surge as new birds migrate in or the remaining population rebounds due to food abundance. (Individual, Saint Louis, MO - #B3-628.5.40100.417)

Many species respond to sharp population declines with increased reproductive success, especially if habitat remains viable. In this context, the EIS should evaluate the sustainability of the proposed lethal and habitat controls for the red-winged blackbird population. (United States Environmental Protection Agency, Chicago, IL - #B1-162.21.46100.417)

Lethal Methods – Recreational Considerations

113. Public Concern: APHIS/Wildlife Services should not use lethal methods to control red-winged blackbirds.

BECAUSE OF NEGATIVE EFFECTS ON RECREATION

I am writing to express my concern over the attempt to initiate a blackbird-poisoning program. Being a back yard bird watcher and feeder, I do not want to see blackbirds poisoned when I am in turn feeding them. (Individual, Larkspur, CO - #B1-172.1.25300.417)

As active wildlife watchers, we would lose substantial numbers of birds that we could otherwise observe in their natural habitat, and we could be subjected to the sight of large numbers of dead and dying birds. (Individual, Phoenix, AZ - #B3-86.8.11300.102)

I am a birdwatcher and find this solution to a sunflower seed problem outrageous. (Individual, Wilmington, DE - #B3-249.1.25300.425)

Since previous poisonings have proven ineffective, I appeal to you to reconsider this plan. Bird watching is one of the most popular pastimes in America, second only to gardening. It's tragic to think that millions of birds might be killed so more birdseed can be brought to market. (Individual, Memphis, TN - #B3-584.2.25300.417)

Lethal Methods – Social Considerations

114. Public Concern: APHIS/Wildlife Services should not use lethal methods to control red-winged blackbirds.

BECAUSE IT WILL NEGATIVELY AFFECT SOCIAL VALUES

I would like to express that [I] extremely disagree with the way that you are carrying this situation. By killing animals the only result is it will be a bad example for our children, to which we teach that violence is bad, and [being] hypocrites we harm animals, living beings that are defenseless. (Individual, No Address - #B3-83.1.25300.700)

Our children need to enjoy the wonders of nature. How can they when people who take it upon themselves to destroy wildlife because they are becoming a nuisance to them? You need to think about this again—please don't jeopardize the future any more than it is. Our children deserve the same way of life as you did when you were young. (Individual, No Address - #B3-472.2.70510.704)

Please do not poison all those blackbirds.

We have enough death on this planet without this senseless mass slaughter. (Individual, Bexley, OH - #B3-69.1.25300.417)

I am 100 percent against your plans to poison (kill) up to six million blackbirds. This is a very sick and cruel thing to do! Especially in this day and age, where violence is all around us, let's not do any more unnecessary killing. (Individual, Waretown, NJ - #B3-167.1.25300.417)

I am writing to you to express my disgrace and outrage at your plan to poison six million blackbirds. It seems to me yet again that human beings wish to destroy any other species that gets in their way. These birds are just trying to survive, and have as much right to be on this planet. . . . I think you have adopted the method more convenient to you, and not the most ethical or moral method to benefit all. (Individual, No Address - #B3-348.1.25300.417)

BECAUSE OF NEGATIVE EFFECTS ON HUMAN HEALTH

No pesticides This solution is at the basis of many water borne chemicals we will eventually find as the source of human cancers. (Individual, Saint Louis, MO - #B3-21.1.25300.425)

The inability to control the effects of dangerous chemicals has been reported concerning PBDE (polybrominated diphenyl ethers). These chemicals are flame-retardants and are also present in many plastics and foam products, which leach into the environment, are now present in breast milk and indicate that North American women have the highest body burden in the world. These chemicals have also been found in freshwater and ocean fish, in air at remote locations and in sewage sludge. They have been found in meat, fats, oils and bakery products, and in human blood. It will not be possible to assess the total environmental impact of the chemicals. (Individual, Rochester, MN - #B3-437.1.25300.704)

BECAUSE OF NEGATIVE EFFECTS ON RESIDENTS OF BAITING AREAS

I disapprove for several reasons. My husband's family sold part of the original farm to the U.S. Fish and Wildlife in the 1950s. This area is west, across the road from our house and in the spring . . . a project like this is, I think, close to home.

- 1) The thought of this area, which is upwind from our residence, being filled with dead and rotting birds is not one that fills my heart with joy.
- 2) I also do not like the idea of this poison, and the residue from these dead birds getting into the ground water as we get our water from a well on our property. (Business, Clifford, ND - #B3-334.1.25300.920)

BECAUSE SCIENTISTS MAY ONE DAY LEARN THAT BLACKBIRDS CAN BE OF GREAT USE TO HUMANKIND

All creatures are here for a purpose; and although it may not be readily evident, I am certain that scientists will one day learn that these blackbirds can be of great use to mankind. (Individual, No Address - #B3-271.1.25300.700)

BECAUSE RED-WINGED BLACKBIRDS HAVE INTRINSIC VALUE

What is the matter with Agriculture that it would even consider such an idea? Please refrain from poisoning the birds that God created. He did not create them for man to wantonly destroy them. (Individual, Louisville, OH - #B3-216.1.25300.100)

God creates things for a reason, and what right do we have to destroy his creations? These birds were given life by the same hand that gave you yours, and to willingly terminate such a precious gift is simply cruel and unjust. Please do not harm these innocent creatures. (Individual, Maysville, KY - #B3-114.1.25300.700)

BECAUSE BLACKBIRDS ARE AESTHETICALLY PLEASING

Whatever the reason, do not go forward with this plan to poison the blackbirds. I recently saw one in person for the first time in Mono Lake, California . . . and was so impressed with the beauty of this bird. I can't imagine why you would want to hurt them intentionally. Every living creature has a right to live, just as we do. (Individual, No Address - #B3-390.1.25300.700)

I don't understand why they are going to poison these beautiful birds. We here in northern New Hampshire look forward to these birds at our feeder, seems to me the farmers of this country ask for a lot, and get it! Please think this plan over! If this type of things keeps going on, there will be little wildlife or birds in the future. (Individual, No Address - #B3-307.1.25200.417)

BECAUSE LETHAL METHODS ARE INHUMANE

Poisons, by definition, kill! They are indiscriminate in their destruction traveling up the food chain. The consequences of secondary poisoning can devastate a family. If a beloved four-legged family member consumes a poisoned bird, the family pet will become a victim of secondary poisoning. What will happen when a child handles a poisoned bird? The effects of a poisoning death are slow, painful, often irreversible, and again indiscriminate. It doesn't matter if it is the blackbird or your little Cocker Spaniel, Ginger, or your Calico, Sweet pea, or baby Susie; the effects are just as inhumane. (Individual, Aurora, CO - #B1-34.4.25300.419)

I strongly feel that other humane measures should be taken instead, and that would not harm any living creature or our environment. (Individual, Longwood, FL - #B1-147.2.25300.425)

The use of poisoned bait is inherently cruel; it causes a slow and painful death. I have been called on to assist birds which have been poisoned and it is a gruesome death. I urge you to drop the ill-advised poisoning scheme. (Individual, Edgewater, MD - #B1-15.2.25300.700)

BECAUSE NATURAL RESOURCES SHOULD BE TREASURED

Erase this cruel regulation for the poisoning of blackbirds. Many other types of our avian friends are at risk! Requests like this are what make our nation vulnerable to outside disapproval. We must treasure our natural resources. (Individual, No Address - #B3-161.1.25300.425)

BECAUSE IT WILL SET A DANGEROUS PRECEDENT

If enacted, this [lethal] proposal would set a dangerous precedent, permitting widespread poisoning of a species during a season when it is causing no damage. (Individual, Melrude, MN - #B3-373.2.253000.110)

I find the proposal to poison millions of red-winged blackbirds simply wrong. What is the purpose of this action? If we kill these birds, will the U.S. Department of Agriculture plan to kill the deer, turkeys, and other animals that eat corn from our Iowa fields? Will all birds and animals be threatened if they eat from a cultivated field? (Individual, Waterloo, IA - #B3-431.1.25300.425)

115. Public Concern: APHIS/Wildlife Services should consider American Indian cultural and spiritual concerns.

Do local Native American tribes have any cultural and or spiritual concerns for either animal species at risk from herbicide? Do any Native Americans in states and or nations to which the birds migrate have concerns? (Preservation/Conservation Organization, Rapid City, SD - #B1-105.20.25300.708)

Lethal Methods – Economic Considerations

116. Public Concern: APHIS/Wildlife Services should use lethal methods to control red-winged blackbirds.

BECAUSE OF CROP LOSSES SUFFERED BY FARMERS

Every year I can honestly say I lose 25 percent of my crop to these useless pests—the solution is eradication. (Business, Kensal, ND - #B3-701.2.25300.417)

We have raised sunflowers since 1978 and always have a problem with blackbird damage. Last year, 2001, I should have gotten 1800 pounds per acre and I only got 1100. Some places around cattail slough nothing came into the combine hopper. We have had yields down to 800-900 pounds because of blackbirds. Death or poison of some kind is the only alternative. They multiply every year. (Business, Aneta, ND - #B3-659.2.25300.903)

117. Public Concern: APHIS/Wildlife Services should not use lethal methods to control red-winged blackbirds.

BECAUSE IT IS NOT JUSTIFIED BY SHORT-TERM FINANCIAL GAINS

For the sake of short-term financial gain for selected businesses, it is unconscionable to poison wild animals. (Individual, Anaheim, CA - #B1-145.2.25300.106)

And now you want to poison thousands of birds to save a few farmers a few bucks especially considering given birds are causing the smallest percentage of loss. (Individual, No Address - #B3-505.3.25300.900)

If the sunflower industry was created to manufacture and produce feed for birds that have lost access to their natural habitats and food sources, how can anyone that is truly interested in the good and welfare of those birds, all birds, approve and encourage a plan that selectively kills certain birds for a financial gain? (Individual, East Lansing, MI - #B1-188.3.60100.906)

BECAUSE KILLING MILLIONS OF RED-WINGED BLACKBIRDS TO SAVE ONE PERCENT OF A SEED CROP THAT LOSES OVER 20 PERCENT ANYWAY MAKES NO SENSE

On the surface this is a "no-brainer."

A 21 percent crop loss if millions of birds are killed vs. a 22-23 percent crop loss if no birds are killed.

I'm not normally a tree-hugger or a softy but killing millions of blackbirds to save one percent of a seed crop that loses over 20 percent anyway makes NO sense. (Individual, No Address - #B3-138.1.10000.912)

118. Public Concern: APHIS/Wildlife Services should implement Alternative 3.

BECAUSE LETHAL METHODS ARE NOT JUSTIFIED ON ECONOMIC OR SCIENTIFIC GROUNDS

As a local chapter of the National Audubon Society, our mission focuses on the conservation of birds and other wildlife, and we therefore strongly support the alternative that Wildlife Services not be involved in sunflower protection. Wildlife Services cannot justify the poisoning of millions of blackbirds on economic or scientific grounds. (Preservation/Conservation Organization, Saint Louis, MO - #B3-465.1.20130.920)

Wildlife Services cannot justify the poisoning of millions of red-winged blackbirds on economic or scientific grounds. (Preservation/Conservation Organization, Washington, DC - #B1-156.6.20130.913)

Adequacy of Analysis

119. Public Concern: APHIS/Wildlife Services should show adequate justification for poisoning red-winged blackbirds.

The EIS should establish a clear purpose and need for the project. Sunflower crop damage estimates in the Federal Register Notice are based on quantitative studies in only four counties in two of the three states from 1996 to 1998. Assuming that these four counties are representative of damage in the three states, APHIS estimates that producers lost \$8.26 million annually to blackbirds. Since no background was provided on environmental context of the quantitative study (e.g., proximity of blackbird nesting and roosting habitat to study plots), and since the studies occurred over a small area compared to the tri-

state region, we believe that APHIS should present more data to solidly establish the need for broad lethal and habitat controls targeting red-winged blackbirds. (United States Environmental Protection Agency, Chicago, IL - #B1-162.6.40100.109)

APHIS appears to currently have no data on the movement of these red-wings before proposing large scale killing. Where are they nesting? In what states or provinces? Where will the true impact on the population be felt? What are the banding studies that would address these questions? What are the population trends of nesting red-wings in the target region? In many areas, red-wings are decreasing in abundance. Why are these sorts of data not proposed for collection before embarking on large-scale lethal control? (Individual, Iron River, MI - #B3-112.7.46100.912)

FOR ECONOMIC AND SCIENTIFIC REASONS

On behalf of Audubon's one million members and supporters, I am writing to strongly oppose the killing of millions of blackbirds as a means of protecting certain sunflower crops. Wildlife Services has failed to justify the blackbird poisoning and related activities on either scientific or economic grounds.

Nowhere does the proposal indicate that killing millions of blackbirds with poison would lessen the crop damage. The target flock of blackbirds is about 39 million birds. The proposal targets not more than two million birds per year. By reducing the flock by five percent, is the damage to the crop reduced by five percent or is it zero because there are still 37 million blackbirds? (Preservation/Conservation Organization, Washington, DC - #B1-156.1.25300.417)

Please provide quantitative details on how much damage by blackbirds will be required to warrant an APHIS poisoning effort and how many dead blackbirds will cause sufficient relief to cease poisoning. (Preservation/Conservation Organization, Rapid City, SD - #B1-105.16.25300.100)

Given that the National Wildlife Research Center's (NWRC) studies have concluded that spring and fall baiting of migrating blackbirds with DRC-1339 has been ineffective we think that the lethal baiting of blackbirds should cease immediately. We find this especially egregious when a mere \$1.8 to \$3.7 million in total losses are projected annually out of an industry that produces \$188 million annually. The amount of money to be spent on lethal depredation control with its consequent environmental impacts is not justified by the amount of money lost in damaged crops. (Business, Bloomington, IN - #B3-26.3.25300.417)

The stated goal of Wildlife Services blackbird damage management program is to reduce the level of damage to sunflower crops in North Dakota and South Dakota to no more than five percent in individual sunflower fields. This goal cannot be achieved by killing blackbirds because the remaining flocks cannot be disbursed evenly among sunflower fields. If five percent overall losses are acceptable and average current losses are one to two percent then this is not a problem of too many blackbirds. It is a problem of uneven damage to crops. (Individual, Phoenix, AZ - #B3-86.1.25300.920)

120. Public Concern: APHIS/Wildlife Services should reevaluate the number of red-winged blackbirds to be killed in its lethal management plan.

Citizens understand that sometimes, animals have to be killed, but not in such great numbers. Such quick, destructive solutions can only bring more trouble to our fragile world. (Individual, Dover, NH - #B3-211.2.25300.100)

121. Public Concern: APHIS/Wildlife Services should analyze the movement and population trends of red-winged blackbirds before implementing lethal methods.

APHIS appears to currently have no data on the movement of these red-winged blackbirds before proposing large-scale killing. Where are they nesting? In what states or provinces? Where will the true impact on the population be felt? What are the banding studies that would address these questions? What are the population trends of nesting red-winged blackbirds in the target region? In many areas, red-

winged blackbirds are decreasing in abundance. Why are these sorts of data not proposed for collection before embarking on large-scale lethal control? (Individual, Iron River, MI - #B3-112.7.46100.912)

Although the trends are not statistically significant, red-winged blackbird populations, based on the Breeding Bird Survey (BBS), declined in North Dakota, South Dakota, and Minnesota during 1966-98 (most recent year trend data available on BBS web site). Although red-winged blackbird populations in North and South Dakota show insignificant increases during 1978-98, Minnesota red-winged blackbird populations showed a significant decline ($P=0.00142$, trend=-2.70). Red-winged blackbird populations also could be hurt by cumulative effects of Wildlife Services' blackbird control activities using DRC-1339 at other locations, such as Louisiana, Texas, and Kansas. (Individual, Great Bend, KS - #B2-2.1.46100.912)

122. Public Concern: APHIS/Wildlife Services should analyze the effects of lethal methods on non-target species.

BY MONITORING MORTALITY OF NON-TARGET SPECIES

Mortality of non-target species should be frequently monitored. The EIS should identify how the lethal control program will be modified to more specifically target red-winged blackbirds, if large numbers of non-target species are being killed. Specimens of any rare species should be collected and supplied to universities or museums for mounting or other scientific purposes. (Minnesota Department of Natural Resources, Saint Paul, MN - #B2-4.5.25310.419)

BY DISCLOSING THE SPECIFIC RESULTS OF THE AVICIDE TOXICITY TESTS AND ASSESSMENTS OF AVICIDE HAZARDS TO NON-TARGET SPECIES

What are the specific results of the avicide toxicity tests and assessments of avicide hazards to non-target species (from research at North Dakota State University and South Dakota State University)? (Individual, No Address - #B3-142.16.25300.912)

BY ANALYZING THE EFFECTS OF VARIOUS DOSAGES OF POISON ON THE REPRODUCTIVE ABILITY OF MIGRATING BIRDS

I have been closely following the red-winged blackbird poisoning research project in the state of South Dakota. The poison used is strong and obviously kills migrating birds of many species and negatively affects the reproduction ability of hen ringed-neck pheasants at high levels. However, the impact on the reproductive ability at lower dosages is unknown for most birds. I suggest that further research [on the] reproduction of all migratory birds attracted to the spring baiting plots and the various dosages at which these effects might occur including small doses. This could be especially important for those birds that don't travel in large flocks, those birds present during later spring poisoning efforts targeting female redwings, and those non-target birds with relatively high lethal tolerances to DRC-1339 but without adequate evaluation for sub lethal effects. (Individual, Sioux Falls, SD - #B1-30.1.40100.912)

BY ANALYZING THE EFFECTS ON BIRDS OF PREY

What are the specific results of the avicide toxicity tests and assessments of avicide hazards to non-target species (from research at North Dakota State University and South Dakota State University)?

How is the loss of a certain number of individuals of a non-target species like the Barn Owl affecting the environment as natural predators are removed from the ecosystem? How many Barn Owls are killed? What kinds, and how many, of other raptors are destroyed? How is their loss affecting the environment? (Individual, No Address - #B3-142.16.25300.912)

Several bird species in the Dakotas feed on dead or dying birds, including great-horned owl, marsh hawk, red-tailed hawk, short-eared owl and magpie. Has the impact to these species been adequately considered, particularly when the projected number of carcasses may be in excess of 2 million? (Preservation/Conservation Organization, Fargo, ND - #B1-174.4.40100.419)

BY ANALYZING THE EFFECTS ON INSECT POPULATIONS

Should it be decided to continue to use lethal methods to control blackbirds, such as DRC-1339 we also recommend that a study be created to determine if there is a corresponding rise in insect populations once the blackbirds have been terminated. (Business, Bloomington, IN - #B3-26.5.25300.920)

If the blackbird damage is estimated at one to two percent of the crop and the insect damage is seven percent it would stand to reason that poisoning a bird that eats insects would only increase the insect damage. Has this been considered? (Individual, Easton, PA - #B3-137.1.25300.421)

What enhanced insect damage might be expected on sunflowers when such an important insect predator population is drastically reduced. Currently insect damage is estimated at seven percent—WELL above the paltry one-two percent estimated for blackbirds. Eliminated roosts and subpopulation of blackbirds could have the same regionalized effects on sunflower productions currently assigned to sunflowers in specific areas that have intensive lethal control of blackbirds. (Individual, Iron River, MI - #B3-112.6.40300.903)

In the U.S. Department of Agriculture publication, Controlling Blackbird Damage to Sunflower and Grain Crops in the Northern Great Plains, it is noted that the blackbirds to be killed feed primarily on insects. What consideration has Wildlife Services given the human, economic, and crop consequences of eliminating these insect predators? (Preservation/Conservation Organization, Washington, DC - #B1-156.5.40100.920)

I was very upset to hear of the plans to kill birds—I have a marsh area behind my house and I would hate to see red wing blackbirds killed—don't you know they are beneficial to us because they keep down bugs that could harm land and people. (Individual, No Address - #B3-80.1.40100.920)

123. Public Concern: APHIS/Wildlife Services should demonstrate that poisoning red-winged blackbirds will not kill other wildlife.

Wildlife Services has failed to demonstrate that the poison they are using will not kill other birds especially threatened bird species. Wildlife Services cannot have it both ways saying that it is effective killing blackbirds but other birds will not be poisoned. The fact is that 68 species of non-target birds have been observed in or near sunflower fields in the spring. Thirty-two of these bird species are granivorous birds which like blackbirds are likely to be killed by the poison bait. This is especially true because these birds are under stress from migration with limited food choices making Wild Services poisoned banquet that much more tempting and deadly. (Individual, Olathe, CO - #B1-219.4.25300.419)

124. Public Concern: APHIS/Wildlife Services should analyze the potential risk to humans from using lethal methods.**DUE TO CONSUMPTION OF POISONED GAME ANIMALS**

What is the concentration of the poison in the food chain? Will game animals eat the rice and is there any risk via human consumption of poisoned game animals? (Preservation/Conservation Organization, Rapid City, SD - #B1-105.9.25300.425)

DUE TO CONSUMPTION OF PRODUCTS MADE FROM SEED GROWN NEAR POISONED AREAS

And what about the humans that will eventually ingest this poison which will inevitably turn up in sunflower oil produced from seed grown near this poisoned rice? (Individual, Moon Township, PA - #B3-71.11.25310.419)

I am a person who uses sunflower oils in cooking and I am concerned that my oil may be tainted with small amounts of poison. (Individual, Duluth, MN - #B3-487.9.25311.602)

I put out sunflower seeds for the wild birds that live in my area. Some brands are well cleaned, while other brands are dirty with plant parts, broken seeds and fragments of shells, and dirt. Can you guarantee that poisoned rice kernels will not get into the packages of sunflower seeds that I purchase for the wild birds I feed? Can you guarantee that children will not get into packages that might contain poisoned grains? (Individual, Corrales, NM - #B3-644.2.25300.602)

What are the short-term and long-term impacts to human beings from the proposed pesticides and herbicides? As noted in the Scoping Document, some of the sunflower crop is for human consumption. In addition, the sunflower fields are rotated with other crops that are eaten by people. (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.13.40300.700)

125. Public Concern: APHIS/Wildlife Services should analyze the risk of botulism outbreaks.

The killing of two million blackbirds (at a weight of 2 to 2.5 ounces) could result in 150 tons of bird carcasses, which could lead to outbreaks of avian botulism in wetlands, affecting a myriad of bird species. The effects on wetlands from bird carcasses have not been addressed and warrant further analysis. (Preservation/Conservation Organization, Saint Louis, MO - #B3-465.6.40100.425)

BY MONITORING WETLANDS IN THE PROJECT AREA FOR BOTULISM OUTBREAKS

We continue to have concerns over the take of non-target species and the possible contribution to outbreaks of botulism. We suggest that wetlands in the project area be monitored for potential botulism outbreaks during the baiting periods. While the previous study indicates a fairly small number on non-targets observed in the study area we believe that additional data collection is needed. (North Dakota Game and Fish Department, Bismarck, ND - #B2-6.5.25300.425)

126. Public Concern: APHIS/Wildlife Services should prepare an environmental assessment that will evaluate the plan to poison blackbirds in greater depth than in past evaluations.

I am asking that an Environmental Assessment fully and objectively evaluate the following issues in greater depth than in past evaluations.

1. The need for the poisoning program.
2. The unlikely effectiveness of poisoning, because given their massive numbers, they can't be controlled in this manner.
3. Which staging areas will be associated with substantial springtime damage?
4. The real potential of non-target impacts of the proposed program. (Individual, Bovey, MN - #B3-604.1.25300.912)

127. Public Concern: APHIS/Wildlife Services should adequately analyze lethal management prescriptions in an EIS.

THE ENVIRONMENTAL EFFECTS OF AVIAN PESTICIDES ON BLACKBIRDS AND OTHER WILDLIFE

Here are some questions/issues I would like addressed in the EIS:

Without any invasive animal studies, I would like to know the environmental impact of using avian pesticides on blackbirds and other birds. If we know how much we are applying and we know the bird populations, we can determine how many birds will be impacted. The pesticide may break down in the environment, what about in the body? Is the pesticide stored in fatty tissue? What about the impact of metabolic byproducts from the original pesticide? (Individual, Grandview, MO - #B3-462.2.25240.417)

THE EFFECTS ON BLACKBIRD AND NON-TARGET POPULATIONS

The document should answer the following questions—How many red-winged blackbirds would be killed annually with the lethal baiting program? What percentage of these birds are likely to be the problem birds that damage sunflower crops? What other species of blackbirds will be targeted for lethal

control? How many red-winged blackbirds, yellow-headed blackbirds, and grackles from the problem areas must be culled in order to achieve a reduction in sunflower damage? (United States Fish and Wildlife Service, Denver, CO - #B1-161.3.25300.425)

THE PRESENCE, DISTRIBUTION, AND EFFECTS ON SPECIES IN THE TREATMENT AREAS

The EIS should describe potential impacts to the granivorous relatives of red-winged blackbirds, and other animals that could be impacted by the proposed lethal control program over the three state areas. Monitoring DRC-1339 baiting areas for feeding by target and non-target species would be crucial in understanding presence, distribution and impacts on species in the treatment areas. Monitoring for non-target species by pre-baiting should be a standard practice in the use of DRC-1339. Use of poisoned bait in pre-bait areas where non-target species have been observed feeding is not consistent with DRC-1339 labeling. Additional details on monitoring should be provided in the EIS. Mitigations for significant impacts to non-target species should be described as appropriate in the EIS. (United States Environmental Protection Agency, Chicago, IL - #B1-162.19.25300.419)

THE GEOGRAPHIC AND TEMPORAL SCOPE OF APPLICATION, THE PROCESS FOR INCREASING AVICIDE AND HERBICIDE USE OVER TIME, AND THE CRITERIA FOR MEASURING THE EFFECTIVENESS OF THE ACTION

The proposed program is to "implement an integrated red-winged blackbird damage management program on private lands when requested by resource owners and managers in North Dakota, South Dakota, or Minnesota." However, under the heading "Lethal Techniques," the project is described as targeting blackbirds in east-central South Dakota. It is unclear whether baiting that "would occur on not more than 50 acres" refers to a 50 acre total over the three states, or 50 acres per spring staging area in the three states. Also, it is unclear how long APHIS would pursue this proposed action. The EIS should clarify what the actual geographic and temporal scope of the proposed action is to be. Also, the EIS should clarify APHIS' process for increasing the scope of avicide and herbicide use over time. The EIS should also specify how the effectiveness of the action and its impacts would be measured. (United States Environmental Protection Agency, Chicago, IL - #B1-162.5.25300.912)

THE BACKGROUND BEHIND THE TWO MILLION-BIRD KILL

The South Dakota Department of Game, Fish and Parks recommended that the EIS contain a discussion of the background behind two million-bird kill. Our permits have covered varying numbers, including 0.25, 0.5, one million, and two million. Were results from the two-million-bird experiment different from results when less DRC-1339 was applied? (South Dakota Department of Game, Fish, and Wildlife, Pierre, SD - #B2-3.3.25300.912)

Use of DRC-1339 General

128. Public Concern: APHIS/Wildlife Services should use DRC-1339.

BECAUSE IT IS ENVIRONMENTALLY SAFE

DRC-1339 would be an effective tool to alleviate some of these pests. There are simply too many blackbirds. DRC-1339 has been studied to death. It is environmentally safe, effective, and a tool we as producers desperately need. (Business, Harvey, ND - #B1-134.1.25310.903)

BECAUSE IT IS SAFE FOR NON-TARGET SPECIES

The use of DRC-1339 has been researched thoroughly by U.S. Department of Agriculture and others. It must be recognized that the product has been given a Section Three label by EPA. Many of the "so called" environmental groups will raise the issue of "non-target" species. Much time and money has been poured into this question. Additional LD 50 tests were recently conducted on several species of sparrow. Pheasants have been tested at South Dakota State University. All of the tests have shown that DRC-1339 is safe to a broad group of non-target species. Despite this huge amount of research, most opposition comments will raise the issue of non-targets because it generates emotion. All of the other safety issues to domestic pets, threatened and endangered species have been thoroughly researched by U.S. Department Of Agriculture and others. These are simply not issues. (Business, Bismarck, ND - #B1-85.4.25310.419)

BECAUSE IT IS NEEDED TO PROTECT FARMERS' INVESTMENTS

It is unlikely that there are other pesticide products that have been as thoroughly researched as DRC-1339. We recognize that this is an emotional issue. But farmers must be able to protect their investment in the production of crops as urban dwellers protect their largest investment (house) from rats and other undesirable species. There is a role for U.S. Department Of Agriculture in this process and reducing blackbird numbers in the northern production regions of the Dakotas and Minnesota is an important tool in dealing with a serious and difficult production problem. (Business, Bismarck, ND - #B1-85.8.25310.903)

We as farmers have nothing against birds. I have a birdfeeder in my back yard. But when a pest threatens your livelihood and possibly the whole industry, then prudent, safe measures should be used to combat the problem. DRC-1339 is that tool. Speaking for producers in central North Dakota we favor this proposal. (Business, Harvey, ND - #B1-134.2.25310.905)

It is in this State's and this Nation's best interests to keep our farmers on the land. For sunflower producers, who along with every other farmer, struggle to remain profitable, it makes sense that they be allowed the operational use of a product that has survived the scrutiny of DRC-1339. Particularly when there is virtually no other lethal alternative. (Agriculture Association, Pierre, SD - #B2-1.2.25310.906)

I'm writing to encourage your support of strong blackbird control measures in sunflower. For the past twenty plus years I've watched sunflower growers fight a losing battle with blackbird control. Millions of dollars have been lost with no effective control measures available. Many former sunflower growers have abandoned the crop because they are tired of watching their profits fly south each fall. We've made tremendous progress in developing new sunflower varieties with improved yields only to see acres declining due to lack of available control measures for blackbirds.

Many of these growers will not return to sunflower until blackbirds are under control. Our industry needs the support of your organization to do whatever it takes, including the use of avicide DRC-1339, to control this major pest. Otherwise, growers will continue to plant alternative, less profitable crops and the sunflower industry will be in jeopardy. (Individual, Breckenridge, MN - #B3-572.1.25310.906)

BECAUSE USE OF CANNONS AND GUNS IS NOT COST EFFECTIVE

Blackbirds have been a profit-limiting problem most years. In 2000 I hired to scare the blackbirds out of the sunflowers. We chased blackbirds two times a day and on many days even more often. The cost for shells and labor is very high when comparing it to the current price for sunflowers. There were approximately 140 hours (1 hr x 2 times daily x 7 days/week x 10 weeks) spent chasing blackbirds. In addition I had three propane guns and used two cases of 22 shells and three cases of shotgun shells.

The birds ate approximately 50 percent of the potential yield in one of my fields. There really was nothing I could do other than use propane cannons and guns and I still had a 50 percent yield loss. It is not a cost effective method to use cannons and guns. The blackbird populations (often it looks like a huge black cloud descending upon a sunflower field) have significantly decreased sunflower acreage in Minnesota. It can't be healthy to have large numbers of birds in roosting areas and polluting water areas. We don't want to harm other bird species. The data on DRC 1339 shows it is not harmful to non-targeted species. (Business, Mentor, MN - #B1-179.1.90300.900)

129. Public Concern: APHIS/Wildlife Services should not use DRC-1339.**BECAUSE IT IS INEFFECTIVE**

We are not happy with any of the alternative proposals that will be evaluated in the EIS. Proposals 1 and 2 continue the use of DRC-1339, which seems ridiculous as your own studies found it to be ineffective and it causes extreme suffering to hundreds of thousands of blackbirds, which we feel should be an important consideration. (Individual, Folsom, CA - #B3-456.9.20100.425)

We cite the following in urging the deletion of the DRC-1339 use from all alternatives under consideration and request that each of these items be thoroughly addressed in the scoping document and any EIS that results:

The U.S. Department of Agriculture supported control programs using DRC-1339 have killed hundreds of thousands of blackbirds beginning in the spring of 1992. The new Scoping Document notes that in 1995, 230,000 blackbirds were killed in the spring. An estimated maximum of 500,000 birds were killed from 1996-1999. These programs were ineffective in reducing sunflower seed losses from blackbirds. Instead, since 1991, overall bird consumption of sunflower seed has remained in the range of one to two percent of the total crop. In fact, a recent APHIS study estimates that red-winged blackbird populations have actually increased by 33% from 1996 to 1999 while damage to sunflower crops has remained constant. (Linz et al, 2010). This occurred despite Wildlife Services "population" control programs. Wildlife Services cannot cite any findings that support their hypothesis that such spring or fall controls lessen crop damage from their decade of studying the use and efficacy of DRC-1339 in the Dakotas to control blackbirds. (Preservation/Conservation Organization, Washington, DC - #B3-298.3.25310.417)

BECAUSE IT IS INHUMANE

DRC-1339, an organic compound that causes kidney or heart failure in blackbirds, can take up to three days to cause death in the targeted animal. This poison was especially designed to be slow acting in order to scare other birds away from roosting sites, thereby causing the affected birds to die in one of the most obviously cruel manners possible. (Preservation/Conservation Organization, West Covina, CA - #B3-296.3.25310.700)

From your results, it appears that DRC-1339 . . . is extremely inhumane as it is a slow-acting poison that prolongs suffering. Therefore, we do not believe baiting with DRC-1339 should be continued in any manner. (Individual, Folsom, CA - #B3-456.4.25310.920)

130. Public Concern: APHIS/Wildlife Services should not implement Alternative 2.

BECAUSE IT INCLUDES USE OF DRC-1339

We are utterly opposed to Alternative 2, in that it includes, as one methodology of control spring baiting with DRC-1339. We believe that this procedure causes undue pain and suffering to target and potentially non-target species, including birds protected under the Migratory Bird Treaty Act, poses undue harm to non-target species, and, finally, that it is biologically and ecologically ineffective. (Preservation/Conservation Organization, West Covina, CA - #B3-296.2.20120.920)

131. Public Concern: APHIS/Wildlife Services should delete the use of DRC-1339 from all alternatives.

UNTIL ITS EFFECTIVENESS AND EFFECTS ON NON-TARGET SPECIES HAS BEEN STUDIED

Plans by USDA APHIS/Wildlife Services to kill up to two million red-winged blackbirds with the pesticide-avicide DRC-1339 (3-chloro-p-toluidine hydrochloride) in the spring in South Dakota should be deleted from the alternatives still under consideration. This aspect of the alternatives still under consideration is being undertaken with the stated purpose of protecting sunflower crops from red-winged blackbird depredation. Despite serious concerns raised about the effectiveness of such a program and its impacts on non-target species, APHIS Wildlife Services [continues] to include this poisoning in the alternatives under consideration while proceeding to complete an EIS. (Preservation/Conservation Organization, Washington, DC - #B3-298.1.20100.412)

132. Public Concern: APHIS/Wildlife Services should indicate what DRC-1339 is composed of and explain how it kills.

Please indicate what DRC-1339 is composed of, and what physiological effects take place that kill birds. How long does mortality ensue after consuming DRC-1339 baited rice? (Individual, Omaha, NE - #B3-392.19.25310.417)

133. Public Concern: APHIS/Wildlife Services should respond to the National Environmental Protection Act concerns raised by the public about the use of DRC-1339.

I have attached previous correspondence from myself that have raised issues during either public comment periods on DRC-1339 issues. APHIS has not responded to concerns I have raised in the past and this lack of response has caused me to believe that APHIS at the State and Regional levels has not taken my previous National Environmental Protection Act comments seriously. Since this National Environmental Protection Act effort now seems to be coordinated by Washington APHIS, I continue to be interested in responses to my concerns. (Individual, Sioux Falls, SD - #B1-30.9.12300.104)

134. Public Concern: APHIS Wildlife Services should ensure that DRC-1339 is used as prescribed by the label requirements.

What measures will be taken to assure that DRC-1339 is applied in a manner that is entirely consistent with the labeling requirements? (Individual, Pittsburgh, PA - #B3-375.7.25310.412)

135. Public Concern: APHIS/Wildlife Services should inform the public in advance of the use of DRC-1339.

If DRC-1339 must be used, then the public should be warned via articles in the local newspaper (not public notices which no one reads) and notices on local radio and television. The public needs to be told that DRC-1339 will be used and who to call if they need dead birds removed. (Individual, Great Bend, KS - #B2-2.3.25310.109)

136. Public Concern: APHIS/Wildlife Services should provide an accurate count of red-winged blackbirds killed by DRC-1339 and the location of affected non-target species.

During the last years of working together with U.S. Department of Agriculture APHIS on the DRC-1339 program, two environmental issues have been most prevalent. These two issues seem to be of the most significant interest to our wildlife agencies. One is the accuracy of counting blackbirds killed by DRC-1339, and the second is the locating of any non-targets impacted by the use of DRC-1339. The resolution of these two issues appears to be paramount in the long-term viability of the DRC-1339 program. (South Dakota Department of Agriculture, Pierre, SD - #B1-185.2.25310.425)

Adequacy of Analysis – Use of DRC-1339

137. Public Concern: APHIS/Wildlife Services should analyze the effects of DRC-1339.

ON NON-TARGET BIRDS

Based on your proposal alternatives, my opinion is that Alternative 1 isn't reasonable. Current practice includes use of DRC-1339 "found to be toxic to blackbirds, doves, pheasants, barn owls, and cats." I would think that the poison could kill doves and pheasants, and probably lots of other birds you don't mention. You note that fall baiting was "ineffective," and in spring baiting "insufficient numbers were removed? To reduce damage?" Bottom line—ineffective [for] the problem, but hundreds of thousands of birds killed. (Individual, Langley AFB, VA - #B3-90.4.20110.425)

ON AQUATIC ECOSYSTEMS

Stop using DRC-1339. It is so lethal to so many birds and mammals and it will find its way into the water. What about the fish? You don't mention what DRC-1339's effect is on aquatic ecosystems. (Individual, Mendocino, CA - #B3-118.4.25310.425)

138. Public Concern: APHIS/Wildlife Services should not test the effects of DRC-1339 on migrating and local birds.

As a member of the Lakota Audubon Society of South Eastern South Dakota, I would like to comment on your upcoming plans to poison birds that eat sunflower seeds. I am totally without a doubt against any testing of poison on migrating birds and local birds to determine the effects of DRC-1339 treated brown rice. (Individual, Sioux Falls, SD - #B1-30.14.25300.417)

BECAUSE IT DOES NOT TARGET ALL SPECIES INVOLVED WITH SUNFLOWER DEPREDATION

We cite the following in urging the deletion of the DRC-1339 use from all alternatives under consideration and request that each of these items be thoroughly addressed in the scoping document and any EIS that results:

Red-winged blackbirds are to be targeted during the spring under the Wildlife Services proposal, but this species accounts for approximately 50 percent of sunflower depredation (Kittle et al, 1987). Yellow-headed blackbirds and common grackles, combined, may cause as much damage as red-winged blackbirds. Thus, a program targeting only red-winged blackbirds has not and cannot have much, if any, success in reducing sunflower crop damage. (Preservation/Conservation Organization, Washington, DC - #B3-298.6.25311.425)

139. Public Concern: APHIS/Wildlife Services should produce an EIS to study the potential effects of DRC-1339.

The potential effects of using DRC-1339 in the proposed manner is significant enough to warrant development of an Environmental Impact Statement because this is a major federal action that would significantly affect the human environment. It would be inappropriate to conclude this National Environmental Protection Act analysis with a Finding of No Significant Impact. (Individual, Sioux Falls, SD - #B1-30.5.10100.100)

RATHER THAN AN ENVIRONMENTAL ASSESSMENT

We believe the proposed operational program using DRC-1339 warrants an Environmental Impact Statement rather than an Environmental Assessment. (United States Fish and Wildlife Service, Denver, CO - #B3-461.27.25310.100)

140. Public Concern: APHIS/Wildlife Services should analyze the efficacy of using DRC-1339 in other parts of the country.

The Scoping Document proposes a control program for three states (Minnesota, North Dakota and South Dakota), yet the paragraph describing lethal techniques only mentions DRC-1339 baiting in east-central South Dakota. Is lethal control only proposed for South Dakota? The Minnesota Department of Natural Resources is assuming that lethal control is also a possibility in Minnesota and have provided comments to that effect.

The EIS should report on the efficacy of using DRC-1339 to control blackbirds in other parts of the country. (Minnesota Department of Natural Resources, Saint Paul, MN - #B2-4.2.25310.400)

If DRC-1339 has already been used to poison red-winged blackbird flocks in Texas, then we would like to see what data Wildlife Services has collected in Texas, to exhibit the effect of the poison on other species; we would also like to know what criteria Wildlife Services uses when making a decision to go ahead with the DRC-1339 program. (Preservation/Conservation Organization, Dallas, TX - #B2-10.6.25310.110)

141. Public Concern: APHIS/Wildlife Services should produce evidence that use of DRC-1339 in the Dakotas has resulted in a reduction in loss of sunflower crops.

What is the evidence that DRC-1339 uses in the Dakotas has resulted in a reduction in loss of sunflower crops? The South Dakota Department of Game, Fish and Parks have repeatedly been assured that DRC-

1339 will not become an operational tool without clear proof of a favorable cost-benefit ratio. We have no specific documentation of reduced crop loss aside from speculative estimates of numbers of poison grain applied, theoretically capable of killing a specific number of blackbirds, which, over their lifetime, could potentially have caused a certain amount of damage. (South Dakota Department of Game, Fish, and Wildlife, Pierre, SD - #B2-3.2.20310.909)

142. Public Concern: APHIS/Wildlife Services should explain why DRC-1339 success in Louisiana, and not efficacy results from research in the Dakotas, is the justification for its use in the Dakotas.

The Federal Register notice states the purported success of DRC-1339 in Louisiana as the impetus for APHIS proposing the operational use of DRC-1339 for spring blackbird control in North and South Dakota since the mid-1990s. Thus, the Document should address why DRC-1339 success in Louisiana, and not efficacy results from research in the Dakotas, is the justification for operational use in the Dakotas (i.e., how does apparent success in Louisiana correlate to projected success in the Dakotas?). A more appropriate comparison might be to APHIS studies in Ohio to determine if red-winged blackbird breeding population reduction would reduce damage to corn crops (Stehn and Becker 1982). (United States Fish and Wildlife Service, Denver, CO - #B3-461.10.25310.912)

143. Public Concern: APHIS/Wildlife Services should consider Venezuela's failed attempt to poison dickcissels.

The lessons being learned in Venezuela regarding dickcissel depredation of rice and sorghum and the failed massive poisoning there should be heeded here. Yet more reasons that DRC-1339 blackbird baiting should not take place. (Individual, Graham, NC - #B3-149.8.25300.417)

144. Public Concern: APHIS/Wildlife Services should review DRC-1339 research findings by outside experts.

I urge the U.S. Department of Agriculture and A.P.H.I.S. to 1) initiate and execute rigorous scientific and economic evaluation of the DRC-1330 proposal in collaboration with independent academic researchers in order to 2) delineate management solutions with long-term success and long-reaching consequences in mind. I think that it is possible to define a successful strategy to protect sunflowers from blackbird damage without broadband poisoning of birds. (Individual, Milwaukee, WI - #B3-408.16.25310.912)

"ASSESSING THE EFFICACY OF USING DRC-1339 IN EASTERN SOUTH DAKOTA DURING SPRING TO REDUCE SUNFLOWER DAMAGE" AND STUDY PROTOCOLS QA834 AND QA826

"Assessing the Efficacy of Using DRC-1339 in Eastern South Dakota During Spring to Reduce Sunflower Damage" and study protocols QA834 and QA826. This review of the APHIS proposal was prepared by Doctor Bill Gould, University Statistics Center, New Mexico State University, and is an independent review of APHIS protocols for researching use of DRC-1339 for reducing spring migrating populations of blackbirds in an attempt to reduce sunflower damage. Although this document reviews and critiques 'past research' efforts, it is applicable to the Document since those research efforts and subsequent results will need to be used as a basis for pursuing an operational program. (United States Fish and Wildlife Service, Denver, CO - #B3-461.22.25310.912)

"A CRITICAL REVIEW OF THE LITERATURE ON THE EFFECTS OF DRC-1339 ON NON-TARGET BIRDS WITH SPECIAL EMPHASIS ON EXPERIMENTAL DESIGN, ANALYSIS AND INFERENCE"

The South Dakota Department of Game, Fish and Parks have reviewed all documents supplied by APHIS-Wildlife Services regarding potential impacts to non-target species, a concern we have voiced since this research's inception. We remain extremely skeptical that non-target effects are minimal. In our letter of January 25, 2000, we recommended critical review of DRC-1339 research findings by outside experts, portions of which we found in the document "A Critical Review of the Literature on the Effects of DRC-1339 on Non-target Birds with Special Emphasis on Experimental Design, Analysis and Inference," by Dr. Elisabeth Harrahy of Colorado State University. We encourage APHIS-Wildlife Services to treat Dr. Harrahy's analysis seriously and objectively, since it reflects many of our

longstanding concerns with study design and interpretation. (South Dakota Department of Game, Fish, and Wildlife, Pierre, SD - #B2-3.5.25310.419)

145. Public Concern: APHIS/Wildlife Services should construct a comprehensive plan prior to initiating a new study of the efficacy of DRC-1339.

The North Dakota Game and Fish Department have substantial questions about the sequence and methods of this study. While we are supportive of Wildlife Service's efforts to determine the efficacy of DRC-1339 in reducing blackbird depredation in the Dakotas, we do not believe this study will provide the type of conclusive results that are expected and think some strategic or comprehensive plan needs to be articulated prior to initiating a new study. (North Dakota Game and Fish Department, Bismarck, ND - #B2-6.7.25300.100)

146. Public Concern: APHIS/Wildlife Services should question the willingness and ability of farmers to monitor the use of DRC-1339.

Are the farmers who benefit from the use of this [DRC-1339] compound willing and able to provide the necessary monitoring? A few perhaps, but certainly the willingness and capability of the majority to do so must be questioned. This very important issue appears to be one that has not been adequately addressed. (Preservation/Conservation Organization, West Covina, CA - #B3-296.8.25000.419)

DRC-1339 Spring-Baiting

147. Public Concern: APHIS/Wildlife Services should use DRC-1339 as a management prescription for spring baiting.

The South Dakota Oilseeds Council . . . strongly supports the objective of continuing the blackbird damage management program, while at the same time implementing the DRC-1339 spring baiting for red-winged blackbirds in South Dakota. It's the single best way to proceed on this issue. (Agriculture Association, Pierre, SD - #B1-84.7.25300.100)

BECAUSE RESEARCH SHOWS IT IS SAFE AND EFFECTIVE

Research done by Wildlife Services relating to DRC-1339 spring baiting has proven that it can be an effective alternative in controlling blackbirds. Research has also shown this product is environmentally safe and has had little or no negative impact on non-target species. The current LD50 research on specific sparrows should clear most doubts regarding its effect on non-target species. The study of migratory patterns of female redwing blackbirds, also in progress, should increase the data needed to prove the efficacy of DRC-1339 in spring baiting. (North Dakota Department of Agriculture, Bismarck, ND - #B1-98.5.25311.912)

BECAUSE IT WILL HELP WITH POPULATION CONTROL

A spring application of the DRC-1339 should be tried since it may help control the breeding pairs and would be a more preventive measure of control. (Individual, Fargo, ND - #B1-139.1.25311.100)

I am writing in support of removing 2 million blackbirds in a spring baiting program. I am employed by Agway, Incorporated in Grandin, North Dakota, and crop losses by blackbirds and other weather related problems directly affect my continued employment. I consider it more important to have food and shelter for my family of five than to have a few birds in our front yard feeder and am an avid hunter. I believe in population management for available habitat. It is clear that the blackbird population is too high. (Individual, Grandin, ND - #B1-160.1.25311.907)

BECAUSE SUNFLOWER GROWERS ARE LOSING MONEY

I would like to see the current Wildlife Services' management program continue as well as a spring - migrating red-winged blackbird control for eastern South Dakota using the DRC-1339 bait.

I also as a sunflower grower can hardly consider growing them anymore due to the problem of red-winged blackbirds. (Individual, No Address - #B1-170.2.25311.417)

Blackbirds have devastated many sunflower growers over the years and have had a huge impact on the number of sunflower acres grown. Sunflowers are a crop that northern United States growers have relied heavily on to stay in business. Blackbirds have forced many farmers to raise alternative crops that are less profitable. I support the spring baiting program and any other program that will reduce the population of blackbirds. (Individual, No Address - #B1-166.1.25311.906)

148. Public Concern: APHIS/Wildlife Services should not use DRC-1339 as a management prescription for spring baiting.

BECAUSE THERE IS NOT ENOUGH SUNFLOWER CROP LOST TO JUSTIFY IT

I am concerned about the proposal to poison red winged blackbirds in North and South Dakota using rice laced with avicide DRC-1339 during spring migration.

In the Dakotas, barely one percent of the sunflower crop is lost annually. This is not enough to justify such drastic measures. (Individual, Duluth, MN - #B3-407.2.25311.909)

We urge you to delete from the alternatives under consideration all blackbird killing with DRC-1339, especially in the spring. This blackbird killing has been and will continue to be ineffective in controlling sunflower seed loss. Concentration should be placed on more effective and more beneficial steps to control sunflower seed depredation. Both farmers and birds would then benefit. (Preservation/Conservation Organization, Washington, DC - #B3-298.20.25310.920)

BECAUSE RED-WINGED BLACKBIRDS ACCOUNT FOR ONLY ABOUT 50 PERCENT OF SUNFLOWER LOSS

Red-winged Blackbirds are to be targeted during the spring under the Wildlife Services proposal, but this species accounts for approximately 50 percent of sunflower depredation (Kittle et al, 1987). Yellow-headed Blackbirds and Common Grackles, combined, may cause as much damage as Red-winged Blackbirds. Thus, a program targeting only Red-winged Blackbirds has not and cannot have much, if any, success in reducing sunflower crop damage. (Preservation/Conservation Organization, Washington, DC - #B3-153.4.25310.912)

BECAUSE IT IS MOSTLY LOCALLY NESTING BIRDS THAT ARE RESPONSIBLE FOR THE DAMAGE, NOT THE TARGETED POPULATION WHICH BREEDS ELSEWHERE

Red-winged blackbirds targeted in South Dakota staging areas in the spring under the Wildlife Services' proposal breed mainly in Canada. However, past Wildlife Services studies have shown that it is predominantly locally nesting birds that are responsible for the sunflower depredation in question. Therefore, killing red-winged blackbirds in South Dakota in the spring will not be effective in controlling depredation on sunflower seeds in the fall. (Individual, State College, PA - #B3-102.6.25311.418)

BECAUSE NUMEROUS INDEPENDENT VARIABLES ARE NOT BEING ACCOUNTED FOR

With regards to the current proposal/study to bait blackbirds in the spring, the North Dakota Game and Fish Department have serious doubts if the study design will provide conclusive results either. Specifically, while this study may cause some degree of additive mortality to the blackbird population in the Dakotas, there appears to be numerous independent variables which the study hasn't accounted for and could therefore produce flawed results. They include but are not limited to natural population variability, changes in nesting habitat or range, predation, climatic conditions which affect migrational timing and concentrations, changes in alternate food sources, crop maturation, etc. If these factors cannot be accounted for, we question the merits of conducting the study as proposed. This is especially true if Wildlife Services is going to use the results of this study in determining whether or not to go operational with spring baiting of DRC-1339. (North Dakota Game and Fish Department, Bismarck, ND - #B2-6.4.25311.912)

BECAUSE IT IS NOT EFFECTIVE

Poisoning blackbirds in the spring to reduce losses to sunflower crops poses a low probability of solving the problem. Spring migratory flocks of blackbirds are comprised of individuals from a wide geographic

area, and to attempt poisoning during migration provides little probability of removing the local birds that inflict losses on sunflower crops later in the year. (Individual, Milwaukee, WI - #B3-408.1.25311.602)

Plans by U.S. Department of Agriculture's APHIS/Wildlife Services to kill up to two million red-winged blackbirds with the pesticide-avicide DRC-1339 (Three-chloro-p-toluidine hydrochloride) in the spring in South Dakota should be deleted from the alternatives still under consideration. This aspect of alternatives still under consideration is being undertaken with the stated purpose of protecting sunflower crops from red-winged blackbird depredation. Despite serious concerns raised about the effectiveness of such a program and its impacts on non-target species, APHIS/Wildlife Services continues to include this poisoning in the alternatives under consideration while proceeding to complete an EIS. (Preservation/Conservation Organization, Washington, DC - #B3-153.1.25311.100)

I am writing to urge you to reject plans by the U.S. Department of Agriculture's APHIS-Wildlife Services to poison up to two million red-winged blackbirds with the pesticide-avicide DRC-1339 in the spring in South Dakota.

I vehemently oppose this poisoning because there is no scientifically sound evidence that poisoning the blackbirds in the spring will have any effect on reducing damage to ripening sunflowers. Despite the previous killing of hundreds of thousands of blackbirds beginning in the spring of 1994, overall bird consumption of sunflower seed has remained in the range of one to two percent of the total crop. A recent APHIS study estimates that red-winged blackbird populations have actually increased by 33 percent from 1996 to 1999 while damage to sunflower crops has remained constant. (Individual, Austin, TX - #B3-155.1.25311.912)

The Document should include a discussion of how spring population reductions are expected to lead to a measurable reduction in nesting populations and a significant reduction in damage to sunflower crops. This concept should be discussed in light of recent research results provided in the APHIS report titled "Has an Integrated Pest Management Approach Reduced Blackbird Damage to Sunflowers?" (Linz et al. In Press). This report states that blackbird populations increased by 33 percent from 1996 to 1999, yet sunflower damage remained constant over this same period. Furthermore, this situation occurred despite extensive DRC-1339 spring baiting at the South Dakota roosts. (United States Fish and Wildlife Service, Denver, CO - #B1-161.2.25311.912)

BECAUSE IT WILL AFFECT NON-TARGET SPECIES

The plan calls for spreading poison-laced rice in the spring, when the birds are hungry and begin to migrate north to nest. A South Dakota study showed that 294 species of birds, in addition to red-winged blackbirds, were eating from a poison-laced test site. (Individual, No Address - #B3-162.2.25311.419)

The [lethal] proposal will kill western meadowlarks, savannah sparrows, mourning doves, and other grassland species associating with redwings in spring or feeding on their own in the treated fields.

This proposal will likely also kill individual predators such as northern harriers and American kestrels that hunt over the treated fields if the predators take a fleeing bird when its crop is full of poisoned bait. (Individual, Saint Paul, MN - #B3-405.4.25311.419)

I am opposed to any spring poisoning of red-winged blackbirds. My objection is based upon the apparent fact that APHIS' own experiments have shown the poisoning to be ineffective as preventing heavy (but geographically very limited) blackbird damage to the sunflower crop of a small number of Dakota growers. (Individual, Southport, CT - #B3-1.1.25311.912)

The six million redwings proposed to be killed in this spring poisoning proposal will include a high percentage of individuals that would not have been implicated in sunflower crop destruction six months later when the crops are actually ripening. (Individual, Saint Paul, MN - #B3-405.3.25311.912)

BECAUSE OF THE EFFECTS ON BLACKBIRD POPULATIONS IN OTHER AREAS

One of my concerns with your proposed plan of poisoning two million blackbirds annually at the spring migration is the effect on the blackbird population in other areas. On my 40-acre home site, there are only a few nesting blackbirds. Considering the habit of most birds to return to the same nesting sites every year, how can I be sure that the blackbirds from my backyard would not be among those poisoned. Even if they were not, they would have to be from somewhere and maybe that somewhere would be someone else's home where they care just as much about having blackbirds as I do. (Individual, No Address - #B3-446.1.25300.705)

BECAUSE IT IS A MISUSE OF POWER

I think this [spring baiting] is a most hideous misuse of power!

How dare you poison birds! This has been tried before and it doesn't work. Don't you people ever learn anything from previous mistakes? If the definition of insanity is doing the same thing over and over again expecting different results—well it seems that shoe fits you people perfectly? (Individual, No Address - #B3-505.1.25311.700)

BECAUSE THE FOCUS SHOULD BE ON BETTER METHODS FOR PREVENTING SUNFLOWER DEPREDATION

I urge the rejection of this flawed control plan and urge you to abandon this proposal to kill red-winged blackbirds in the spring and to concentrate on more effective and more beneficial steps to control sunflower seed depredation. Both farmers and birds would then benefit. (Individual, Camp Hill, PA - #B3-98.1.25311.920)

Adequacy of Analysis – Spring-Baiting**149. Public Concern: APHIS/Wildlife Services should analyze the effectiveness of spring baiting.**

Extensive research needs exist before this chemical should be used in the manner described in the current proposal. These research needs and the ability to address these needs appear to be outside the capabilities of the APHIS research branch that has conducted much of the baiting proposals in the Dakotas. Specifically, many of the researchers have been pressured into undertaking research prior to developing adequate study design and review by knowledgeable bird experts. Or if that information is received, then the information ignored or discounted. Therefore, after years of research, very basic questions remain unanswerable about spring baiting in the Dakotas. For example, will spring reductions of blackbirds reduce sunflower depredations in late summer and early fall? To date APHIS research is unable to address this most elementary of questions. Why is APHIS now proposing expenditures of taxpayer monies on an operational program unsupported by research that is very likely to fail? In addition to the high likelihood that an operational program will not relieve the acknowledged localized depredations of select sunflower growers, this operational effort is likely to put large numbers of non-target birds at risk. Clearly further research is needed before approving a spring operational program that seems as likely to fail as the similar operational fall baiting program which was an utter failure and waste of money. (Individual, Sioux Falls, SD - #B1-30.3.25300.912)

BECAUSE TRIAL KILLINGS SHOWED IT TO BE INEFFECTIVE

Who will assess sunflower damage? What level of reduction will be considered significant? Alternative 2 states, "if spring baiting does not reduce sunflower damage, the spring baiting program will be terminated". Who will determine whether this reduction has occurred and what sort of statistics and margin of error will be employed? The scoping document seems to indicate that there are no reliable estimates of damage at the level of a field, where reduction in damage would most likely be measured. Instead, APHIS seems to be relying on farmers' anecdotal reports (page 3) without background data (means with associated standard deviations), how can significant levels of reduction be ascertained? Will experimental data be considered as evidence that spring baiting is ineffectual? Your scoping document cites the lack of effectiveness of trial killings of nearly a quarter of a million blackbirds. This does not bode well for the effectiveness of this lethal technique. (Individual, Iron River, MI - #B3-112.8.20120.912)

TO DETERMINE THAT THE RED-WINGED BLACKBIRDS TARGETED DURING SPRING BAITING ARE THE SAME POPULATION THAT DAMAGES SUNFLOWER CROPS IN THE FALL

In the Notice, APHIS does not establish whether the red-winged blackbirds that follow a spring migration route through east-central South Dakota are the same population that is present around ripening sunflower fields when damage occurs. If APHIS or another organization has capture and release data indicating that the population is the same, that data should be included in the EIS to support the relationship of the purpose and need to the lethal and habitat control proposals. (United States Environmental Protection Agency, Chicago, IL - #B1-162.7.40100.912)

Extensive research needs to exist prior to using of DRC-1339 on an operational basis for spring poisoning efforts. While APHIS has studied this issue for nearly a decade, they have yet to scientifically show any possibility that killing large numbers of non-depredating blackbirds in the spring will reduce sunflower depredations for select growers in the fall. Research needs to demonstrate this very basic concept prior to undertaking the operational program. (Individual, Sioux Falls, SD - #B1-30.6.25311.425)

I am aware that APHIS has researched efficacy studies of DRC-1339 for springtime lethal control of blackbirds since 1994. Unfortunately, results that indicate any reductions in fall sunflower depredations are lacking or have yet to be made public. Therefore it seems premature to attempt lethal control of up to two million black birds per spring for an action that research has been unable to show any reduction in fall sunflower depredation. (Individual, Bismarck, ND - #B2-5.1.25312.912)

If this proposal goes through, what good is the spring killing when no damage is done to the crops at that time? Will the birds remember and not stop in the fall migration? (Individual, New London, WI - #B3-411.1.25311.417)

Has APHIS done enough study of blackbird migrations to prove that the birds baited in the spring in South Dakota and North Dakota will be the same set of birds that feed in South Dakota and North Dakota fields in the fall? (Preservation/Conservation Organization, Rapid City, SD - #B3-452.1.25000.417)

TO DETERMINE ITS NET EFFECT ON SUNFLOWER SEED PRODUCTION

Will the proposed spring baiting have any significant net effect on sunflower seed production? (Individual, Pittsburgh, PA - #B3-375.6.25311.906)

TO DETERMINE THE CUMULATIVE EFFECTS OF KILLING 2 MILLION BLACKBIRDS ANNUALLY

Please indicate what the cumulative impacts are of killing two million blackbirds annually, through bird baiting in the spring? Where will these carcasses end up? Will carnivores be susceptible? Others? (Individual, Omaha, NE - #B3-392.21.25311.417)

TO DETERMINE ITS EFFECTS ON THE GRACKLE AND YELLOW-HEADED BLACKBIRD'S NESTING POPULATIONS

The red-winged blackbirds may account for only 50 percent of the damage to sunflowers according to recent research results (Peer et al. 2000); yellow-headed blackbirds and grackles account for the other 50 percent. The Scoping Document should identify what effects a spring baiting program will have on the nesting populations of these two species, if any. If the spring baiting program has limited effect on the nesting population of these species, how will this affect the success of the program to protect sunflower crops? (United States Fish and Wildlife Service, Denver, CO - #B1-161.4.25300.419)

150. Public Concern: APHIS/Wildlife Services should seek research support from the United States Geological Survey-Biological Research Division to determine spring baiting efficacy.

BECAUSE THE CURRENT RESEARCH NEEDS ARE BEYOND APHIS CAPABILITIES

It is likely that the magnitude of the spring baiting research needs is beyond APHIS current research capabilities and would benefit from experimental design and statistical support from the United States Geological Survey-Biological Research Division. Previous spring efficacy research studies appear to have been ineffectively designed/conducted so as to render the data nearly useless for correlating blackbirds removed by spring poisoning efforts and changes in fall sunflower depredation rates. Future research efforts must substantiate the connection between poisoned birds in the spring and reductions in sunflower depredations in the fall to those producers in experiencing high sunflower depredation levels. A very challenging research proposal. If the research is unable to correlate spring poisoning with changes to fall sunflower depredation rates then lethal control should not even be discussed as an operational tool. Anything less will be wasting taxpayer monies on a program that does not work while putting non-target birds and animals at risk. (Individual, Bismarck, ND - #B2-5.4.13300.100)

DRC-1339 Fall-Baiting

151. Public Concern: APHIS/Wildlife Services should not use DRC-1339 as a management prescription for fall baiting.

BECAUSE FALL BAITING IS INEFFECTIVE

A previous attempt by APHIS's Operations Program also insisted on using DRC-1339 for lethal control program but during the fall period. Research was absent to indicate this might work. Subsequent evaluations of fall baiting showed no reduction in sunflower depredations. Additional research and sunflower producers eventually proved that fall baiting was a complete waste of taxpayer money in addition to putting non-target birds at risk. It would be unfortunate to repeat the fall baiting boondoggle with a spring baiting fiasco. (Individual, Bismarck, ND - #B2-5.3.25310.912)

The new scoping document before us at E.1.a.3, calls the DRC-1339 fall baiting program "ineffective" as the baited rice kernels did not successfully lure blackbirds from ripening sunflower heads. This element of blackbird control should be terminated as it is ineffective and may kill non-target granivorous birds. (Preservation/Conservation Organization, Washington, DC - #B3-298.4.25312.419)

BECAUSE RESEARCHERS HAVE FAILED TO COLLECT SUFFICIENT DATA, FAILED TO FOLLOW LABEL DIRECTIONS PROTECTING NON-TARGET SPECIES, AND FAILED TO FOLLOW PROPER NOTIFICATION PROTOCOLS

The November 2001 Audubon magazine article on the blackbird management program raised some troubling questions, especially those coming from U.S. Fish and Wildlife Service. Agent Larry Gamble's comments on the fall DRC-1339 baiting included statements on Wildlife Services researchers collecting insufficient data on the trials, Wildlife Services' staff not following DRC-1339 labeling directions protecting non-target birds, and notification to United States Fish and Wildlife Services officials of the fall trial DRC-1339 EA on the same day that APHIS started baiting. (Individual, Graham, NC - #B3-149.5.25310.103)

Other Lethal Methods

152. Public Concern: APHIS/Wildlife Services should use shotguns to control red-winged blackbirds.

I suggest you use steel shotgun pellets, at least only the targeted birds will be killed. (Individual, Brookings, OR - #B3-385.3.25300.419)

153. Public Concern: APHIS/Wildlife Services should address the effects of aerial gunning on wild bird populations.

BECAUSE IT CANNOT DISCRIMINATE BETWEEN TARGET AND NON-TARGET SPECIES

What is the impact on wild bird populations, blackbird and otherwise, of shooting as a lethal method employed to reduce sunflower damage? How do growers and others who use this method discriminate among the various wild bird species, including those species with a relatively high gross number; for example, red-winged blackbird, and those with a relatively low gross number; for example, Brewer's blackbird? How has aerial gunning affected this? How do aerial gunners discriminate between target and non-target species? (Individual, No Address - #B3-142.16.25300.912)

Chapter 5

Environmental, Natural Resource, and Socioeconomic Considerations

Environmental Values

Environmental Values General

154. Public Concern: APHIS/Wildlife Services should protect the environment.

Why do agencies such as yours try to resolve a "problem" by creating another problem? You should know that nature is a balance and cannot be manipulated by man. Your agency should be protecting all wildlife and the environment, not acting on the wishes of large farm co-operations. It is wrong to kill so many animals, wrong for the environment and wrong for the country. (Individual, Kohler, WI - #B3-413.2.25300.920)

Try to use some imagination in coming up with a better idea that will not harm our environment, as this will. This idea sounds like it's more of an appeasement to a certain lobby group than one that is actually supposed to work. For once let's try and do something that has the environment as the best interest of our country rather than some lobby organization. (Individual, Southold, NY - #B3-501.2.20000.920)

Reduce the environmental impacts by using low-impact alternatives that do not disrupt the ecological system to a large degree. (Individual, Crystal, MN - #B3-14.5.20000.400)

I hope you will use all of your resources and energy to come up with an alternative that is environmentally safe as well as morally sound. (Individual, San Clemente, CA - #B1-141.3.20200.920)

155. Public Concern: APHIS/Wildlife Services should implement Alternative 3.

BECAUSE IT AVOIDS LONG-TERM CONSEQUENCES TO THE ENVIRONMENT

Unless you are prepared to conduct long-term studies of the environmental consequences of using these poisons, I again vote for Alternative 3, in which Wildlife Services plays no role in the sunflower industries of North and South Dakota. (Individual, Dover, NH - #B3-429.7.20130.400)

156. Public Concern: APHIS/Wildlife Services should not manipulate the environment for short term financial profits.

Please let nature be and work with her instead of attempting to manipulate nature for short-term financial profits. (Preservation/Conservation Organization, Irvine, CA - #B1-146.4.40300.400)

You cannot destroy the environment to save one-two percent of the sunflower production. (Individual, No Address - #B3-2.3.40000.906)

Wildlife

Wildlife General

157. Public Concern: APHIS/Wildlife Services should protect wildlife.

As U.S. citizens, we are the legal owners of the wildlife in this country. The government has a duty to protect our wildlife, rather than slaughter it for commercial interests. (Individual, Phoenix, AZ - #B1-21.3.46000.103)

Can't you people concentrate on saving wildlife and not destroying it? What kind of people are you? Have you no conscience? (Individual, Houston, TX - #B3-199.3.46100.103)

I also realize this is a taxpayer-funded government agency that has been engaged in the poisoning and slaughter of wildlife in the United States for many years; as a taxpayer I highly object to the USDA's actions. As a taxpayer I highly object to such blatant damage to wildlife. (Individual, Kensington, MD - #B3-175.1.46000.414)

I think the rampage to kill, eliminate, exterminate, destroy various wildlife by various governmental agencies in this country is just maniacal. (Individual, No Address - #B3-284.2.46000.425)

Why do agencies such as yours try to resolve a "problem" by creating another problem? You should know that nature is a balance and cannot be manipulated by man. Your agency should be protecting all wildlife and the environment, not acting on the wishes of large farm cooperations. It is wrong to kill so many animals, wrong for the environment and wrong for the country. (Individual, Kohler, WI - #B3-413.2.25300.920)

BY PLACING A HIGHER VALUE ON WILDLIFE THAN ON ECONOMICS

Poisoning blackbirds to protect sunflowers. What's next? Poisoning the deer to protect corn? Poisoning eagles to protect fish? Economics verses humanity. Whose best interests are being served here? (Individual, Kaukauna, WI - #B1-150.2.90000.700)

158. Public Concern: APHIS/Wildlife Services should modernize its wildlife control program.

The USDA is hopelessly only interested in the quick [fix] and often only a very very cruel one. Come into the twenty-first century, people care about what we are doing to animals and how we are impacting the environment. Quite frankly the USDA has a shoddy reputation as a body that will spend more money killing wildlife in the cruelest possible manner than it would take to fix the problem any other way. (Individual, Camp Hill, PA - #B3-309.4.11120.103)

159. Public Concern: APHIS/Wildlife Services should comply with the Migratory Bird Treaty Act.

What are the measures APHIS will undertake to comply with the Migratory Bird Treaty Act? (Preservation/Conservation Organization, Rapid City, SD - #B2-8.5.30307.102)

We understand that to get around the Migratory Bird Treaty Act, which prohibits the direct killing of migratory birds (exactly what you propose to do), the poisoning program is called a "scientific experiment". The truth is that you are violating the Migratory Bird Treaty Act. (Individual, Enderlin, ND - #B1-163.6.30307.104)

BY ACQUIRING PERMITS TO TAKE MIGRATORY BIRDS

A recent Federal Court decision in an Oregon case, Headwaters v. Talent Irrigation District of Columbia ruled in the Humane Society of the United States v. Glickman (No. 99-5309) that federal agencies are subject to the provisions of the Migratory Bird Treaty Act (MBTA). USFWS has regulations that provide for permits to take migratory birds for control of depredating birds. The permitting process should be discussed in the EIS. APHIS will need to obtain permits from the Regional Migratory Bird Permit Offices in USFWS Regions 3 (Minnesota) and 6 (North and South Dakota) for implementing its proposal in the three states. (United States Environmental Protection Agency, Chicago, IL - #B1-162.15.11210.405)

Does APHIS need a special depredation permit from USF and WS request (under the Migratory Bird Treaty Act to kill 2 million 6 months before they depredate)? (Individual, Graham, NC - #B3-149.6.30100.101)

160. Public Concern: APHIS/Wildlife Services should comply with the Animal Welfare Act.**TO AVOID PRACTICES THAT LEAD TO NEEDLESS SUFFERING IN WILDLIFE**

The USDA is in charge of the Animal Welfare Act, therefore a citizen expects that some USDA staff have knowledge of modern practices and can be compassionate. I did not appreciate the Final Environmental Impact Statement that dismissed public input for various reasons and announced your continuation of habitual killing of multiple species of birds in Washington. I witnessed a trap for starlings in Skagit County and was told of the numbers of birds that suffer and die in those government-funded traps on a daily basis and which are thus exterminated whenever a farmer feels the whim to call the USDA to request the daily service. (Individual, Bellingham, WA - #B3-269.3.13100.103)

*Adequacy of Analysis – Wildlife General***161. Public Concern: APHIS/Wildlife Services should determine what effects the Nile Virus will have on bird populations.**

We are also concerned as to what is going to happen to many species of birds, particularly the birds that gang up in flocks, and how they will be affected by the Nile Virus that is spreading from the east. Not knowing what will happen with bird populations if this virus continues to spread, we are opposed to mass killing. We urge you to turn down the permit for this docket or any other like it. Please encourage other non-killing solutions. (Individual, No Address - #B3-544.5.40300.417)

*Red-Winged Blackbirds***162. Public Concern: APHIS/Wildlife Services should indicate the measures it will take to minimize the taking of red-winged blackbirds migrating to nesting grounds in Canada.****SINCE, ACCORDING TO APHIS RESEARCH, THESE ARE NOT THE BIRDS THAT DO MOST OF THE FORAGING ON SUNFLOWER CROPS**

What measures will be taken to minimize the taking of blackbirds migrating to nesting grounds in Canada? APHIS research has demonstrated that these blackbirds are not the individuals that do most of the foraging on the sunflower crop. (Individual, Pittsburgh, PA - #B3-375.5.25000.418)

Adequacy of Analysis – Red-Winged Blackbirds

163. Public Concern: APHIS/Wildlife Services should fully evaluate the role of red-winged blackbirds within the ecosystem.

Blackbirds play an important role in the ecosystem and have value that cannot be measured strictly in economic terms. First, all species must be valued as part of an integral and diverse ecosystem. Second, this ecosystem has been significantly altered as a result of human intervention in various forms, including such wide-ranging forces as agriculture, commercial development, residential development, introduction of pesticides and herbicides into the environment, air pollution, water pollution, logging, mining, draining of wetlands, and global warming.

Our understanding of how ecosystems function is limited. We do not know, for example, the long-term implications of this tampering with a naturally functioning ecosystem. We do not know whether the disappearance of a species or the decrease of many species will at some point cause the system or part of the system to “crash”.

What we do know is that one starling will, on average, consume approximately one ton of insects and weed seeds in its lifetime. A starling is one of the blackbird species targeted for death by poison. If enough starlings are eliminated, what will the effect be on the rest of the ecosystem? Insects are controlled naturally not by pesticides but by predators such as birds. If enough birds are eliminated from the ecosystem, it is logical to conclude that insect populations may increase. If insect populations are no longer controlled to the same extent as before by predators, then more pesticides may be needed to control them. More pesticides may result in increased harm to the physical environment in which we live.

Many Neotropical migrants such as warblers, tanagers, flycatchers, and vireos are insect-eaters. Their populations have declined by more than 50 percent in the last 30 years. As these insect-eating birds decline, the value of other birds such as starlings, which eat both seeds and insects, increases.

Therefore, the value of blackbirds in the context of biodiversity and ecosystems must be addressed. (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.20.40200.100)

The EIS should address what effects the removal of a large number of birds might have on the ecosystem. For example, studies of red-winged blackbirds in Manitoba found that animal matter comprised 70 percent of blackbird diets in agricultural areas and 100 percent of blackbird diets in marshes (Bird and Smith, 1964). What impact will removal of blackbirds have on insect populations? (Minnesota Department of Natural Resources, Saint Paul, MN - #B2-4.4.40100.421)

Most important is that this planet is a closed system and the poisoned birds and non-target animals will impact everything, starting with the scavengers who consume the poisoned birds/animals and the scavengers that consume them and so forth and so on. This can be a drastic chain of cause and affect. To think that DDT is still found in fish and ground water more than 20 years after the ban of it, is a perfect example of a closed system and the folly of this current bad plan. There's got to be a better way. (Individual, Bovey, MN - #B3-604.2.40100.425)

I am very concerned about the loss of blackbirds and other non-target birds and non-target wildlife. Could this start the decline of yet another species? How would reduced blackbird and other non-target bird population declines impact or affect the structure/function of wetland ecosystems and biodiversity? How would reduction of cattails impact other birds/wildlife that depend upon these types of wetlands in this region? Perhaps rather than removing the birds (the scoping paper notes on page 1 that “no single blackbird damage management method has proven entirely satisfactory in alleviating crop damage”), the growers should either accept the damage (you can't fight nature on some things), change crops, or move. (Individual, Omaha, NE - #B3-392.9.40200.425)

164. Public Concern: APHIS/Wildlife Services should analyze the effects of red-winged blackbirds on wetland water quality.

An area of research that may not have been addressed is the impact of thousands of blackbirds on water quality in an enclosed wetland. What are the implications of this situation? Does that have negative water quality impacts on migrating waterfowl that also use these wetlands? What about the nitrate load on plant species or ground water in that environment? (Business, Bismarck, ND - #B1-85.7.40100.403)

165. Public Concern: APHIS/Wildlife Services should determine whether the red-winged blackbird population has increased historically.

If the number of blackbirds has not increased historically, then maybe we should not be trying to reduce their population. I would much rather pay more for my sunflower seeds and oil than to disrupt the environment any more than I have to. (Individual, Saint Paul, MN - #B3-19.8.20360.906)

Non-Target Species**166. Public Concern: APHIS/Wildlife Services should implement Alternative 2.****BECAUSE IT WILL HELP CONTROL BLACKBIRD POPULATIONS AND HAVE LITTLE EFFECT ON NON-TARGET SPECIES**

We also strongly and specifically support the objective of continuing the blackbird damage management program, while at the same time implementing the DRC-1339 spring baiting for red-winged blackbirds in South Dakota. It's the single best way to proceed on this issue. (Agriculture Association, Pierre, SD - #B2-1.3.20100.100)

The South Dakota Farm Bureau Federation supports the alternative to: Continue the current Wildlife Services blackbird damage management program, plus implement a DRC-1339 baiting program of spring-migrating red-winged blackbirds in eastern South Dakota. We feel the combination of the non-lethal and lethal techniques would help control blackbird populations while at the same time have very little impact on non-target species. (Agriculture Association, Huron, SD - #B1-144.1.20120.425)

167. Public Concern: APHIS/Wildlife Services should not implement Alternative 2.**BECAUSE IT ENDANGERS NON-TARGET SPECIES**

My concerns about option 2, Integrated Adaptive Management Program are that it proposes poisoning two million birds a year for five years: Causing suffering and death to target and non-target avian species. Causing suffering and death to other wildlife: mammals, insects, and reptiles. Exposing endangered species to the risk of premature death. Creating hazards to human health through pesticide residues in soils, marshes, rivers and lakes. Killing birds on spring migration prior to breeding. (Individual, Toronto, Canada - #B3-372.2.20120.920)

168. Public Concern: APHIS/Wildlife Services should submit a state collector's permit request to The North Dakota Game and Fish Department.**IF THE TAKING OF NON-TARGET SPECIES IS ANTICIPATED**

The North Dakota Game and Fish Department has not received a request from your agency for the incidental take of non-target wildlife associated with the proposed spring baiting project. If the take of non-targets is anticipated as a result of this study, a state collector's permit is required. (North Dakota Game and Fish Department, Bismarck, ND - #B2-6.6.30100.419)

Adequacy of Analysis – Non-Target Species

169. Public Concern: APHIS/Wildlife Services should analyze the loss of non-target species on the environment.

How is the loss of a certain number of individuals of a non-target species like the Barn Owl affecting the environment as natural predators are removed from the ecosystem? How many Barn Owls are killed? What kinds, and how many, of other raptors are destroyed? How is their loss affecting the environment? (Individual, No Address - #B3-142.16.25300.912)

170. Public Concern: APHIS/Wildlife Services should analyze the effects on insects of a reduced red-winged blackbird population.

A reduction in the population of blackbirds could result in an increase in insect populations or other ecosystem changes, which may have more detrimental effects to crops and humans than the current situation. (Individual, Phoenix, AZ - #B3-86.5.46000.920)

Agricultural Products

Agricultural Products General

171. Public Concern: APHIS/Wildlife Services should indicate what types of sunflowers are commercially grown.

AND CLARIFY THAT THEY ARE NOT NATURALLY OCCURRING CROPS

Page 2 (B.1) indicates that sunflowers are native to the states of ND/SD. While this may be true, it is a bit misleading. Tall grass and short grass prairie ecosystems are native to ND/SD. Certain species of sunflowers were components of the vast prairies that once covered the entire region. Are entire fields of sunflowers native to ND/SD? Are 2 million acres of sunflowers native? The document should indicate what type of sunflowers are commercially grown, and that they are cultivated row crops. Not naturally occurring. (Individual, Omaha, NE - #B3-392.18.60100.400)

172. Public Concern: APHIS/Wildlife Services should provide charts that display the distribution of crop damage per farmer.

Please provide a chart that displays the distribution of crop damage per farmer. (Preservation/Conservation Organization, Rapid City, SD - #B1-105.6.20320.903)

173. Public Concern: APHIS/Wildlife Services should not propose alternatives that encourage growers to plant and increase areas of crops.

I am concerned that the alternatives to "protect" sunflower crops are open invitations to the growers to plant and increase the areas of the crops. (Individual, Seattle, WA - #B3-103.1.20200.906)

174. Public Concern: APHIS/Wildlife Services should recognize sunflowers as a natural food source for migrating red-winged blackbirds.

Sunflowers, as stated in your write up, are natural to the geographic areas concerned and are most probably a natural food supply for the blackbirds. Why are efforts being made to deny the blackbirds from their natural food supply? I would hope that some small loss, caused by our indigenous wildlife, be accepted as part of the price for encroaching on the blackbird habitat. (Individual, Cupertino, CA - #B3-424.4.40200.417)

Adequacy of Analysis

175. Public Concern: APHIS/Wildlife Services should analyze which specific red-winged blackbird populations are responsible for sunflower depredation.

We strongly urge WS to continue research on this important issue. Clarify what blackbird populations are responsible, and when and how depredation occurs. (Individual, Stone Mountain, GA - #B3-389.4.46100.912)

176. Public Concern: APHIS/Wildlife Services should verify the percentage of damage done by red-winged blackbirds.

I question the percentage of damage done by the blackbirds and would like the information to be verified. I seriously doubt that the statewide loss of 1-2 percent of the production value of the crop is any higher than any other statewide loss of any agricultural commodity. (Individual, Seattle, WA - #B3-103.6.90100.106)

177. Public Concern: APHIS/Wildlife Services should provide research on how much damage is caused by red-winged blackbirds that congregate at staging sites.

IN SOUTH DAKOTA

The notice in the Federal Register (Vol. 66, No. 98) stated that the red-winged blackbirds will be poisoned at staging sites in South Dakota. Is there any definitive research showing that red-winged blackbirds staging at these sites cause significant damage to sunflower fields in North Dakota, South Dakota, and Minnesota? How much damage do red-winged blackbirds staging at the proposed kill sites do? What percent of the red-winged blackbirds staging at these sites nest in areas without sunflower production? (Individual, Great Bend, KS - #B2-2.2.46100.912)

PROVIDE DATA SPECIFICALLY FOR MINNESOTA

The Scoping Document mentions increasing red-winged blackbird populations, but does not provide data to support this statement. Besser et al. (1984) report a 42% decline in number of male red-winged blackbirds in North and South Dakota in 1965-1981. The EIS should present population data specific to each state in the proposal.

The Minnesota Department of Natural Resources would like to see quantitative data about Red-Winged Blackbird damage specifically in Minnesota. The Scoping Document states that, "damage is not equally distributed, can be severe for some producers, and is fairly consistent from year-to-year within a locality." Given this, limited studies in 4 counties of 2 states is unlikely to be representative. We believe more information is needed to justify lethal control and that such control should not be done in Minnesota based only on North Dakota and South Dakota data. (Minnesota Department of Natural Resources, Saint Paul, MN - #B2-4.1.46100.912)

178. Public Concern: APHIS/Wildlife Services should determine the areas most affected by red-winged blackbird damage.

AND ASSESS THE FEASIBILITY OF CROP ROTATIONS OR LAND SWAPS

Conduct an analysis of the location of all sunflower fields that experience unacceptable levels of damage due to birds/blackbirds. Integrate into a GIS system. Determine how many acres are impacted by blackbirds, by other bird species. Map location of wetlands, wetlands with cattails, state/federal lands. Overlay all. Determine what fields are high risk. Assess feasibility of changing rotation patterns of affected fields (so not all fields have sunflowers growing during any one season) and assess feasibility of a land swap program whereby heavily impacted fields near state/federal lands that are not near wetlands/cattails are traded with the state/federal government. (Individual, Omaha, NE - #B3-392.13.60000.912)

179. Public Concern: APHIS/Wildlife Services should study the effects of sunflower planting density on crop loss due to red-winged blackbird depredation.

Because blackbirds tend to flock, high sunflower planting density would in theory attract a greater number of birds. It would be worthwhile knowing whether decreasing the sunflower planting density has an effect on crop loss. Alternating rows of sunflowers with another crop (or even alternating with sunflowers planted every third row) could decrease the attractiveness of a sunflower field to a large flock of blackbirds. (Individual, Saint Paul, MN - #B3-19.5.25100.602)

180. Public Concern: APHIS/Wildlife Services should study whether crop losses have increased due to the expansion of cultivated fields into areas used by red-winged blackbirds.

I would hope that the EIS can answer the question of whether or not the losses have increased because growers have extended their crop land into areas which were known to be used by migratory birds. (Individual, Seattle, WA - #B3-103.7.25100.912)

181. Public Concern: APHIS/Wildlife Services should evaluate crop losses unrelated to red-winged blackbird depredation.

There is an overestimation of crop losses caused by the target species. Other sources of losses have not been sufficiently studied or documented. (Individual, Milwaukee, WI - #B3-341.3.60000.912)

Sunflower Products

182. Public Concern: APHIS/Wildlife Services should recognize the possibility of a boycott on sunflower products.

You should realize that a plan to kill native wild birds, if implemented, will draw negative national publicity resulting in a general boycott of sunflowers and sunflower derived products including oil, birdseed and confectionary seeds, originating from the Dakotas. This boycott will be organized and promoted by a wide variety of environmental advocacy groups, local and national, as well as from the groundswell of concerned, conservation-minded citizens such as myself. Such a boycott will impact the price of sunflower products thus mitigating any economic benefit of proposed blackbird destruction, and may even create financial hardships worse than what these sunflower growers are facing now. (Individual, Saint Louis, MO - #B3-115.4.60100.906)

I for one will read the label from now on when buying my seeds; if they are from either of the Dakotas, I will find another source. (Individual, New London, WI - #B3-411.8.60100.905)

BECAUSE CONSUMERS DO NOT WANT TO PURCHASE BIRDSEED FOR THE BENEFIT OF SOME BIRD POPULATIONS AT THE EXPENSE OF OTHER POPULATIONS

I purchase birdseed in order to enjoy the company of birds and to increase their available food resources. I do not want to sacrifice bird populations elsewhere to do this. I will choose to stop buying seed commercially and instead increase my own seed production to continue to feed the birds in my area if the USDA goes forward with Docket 01-013-3. In the effort to assist the businesses which distribute the sunflower seeds which have engendered this controversy, you will ultimately hurt them when the public discovers the means for increasing seed production. (Individual, Frederick, MD - #B1-142.2.60100.906)

How could you set out to destroy the environment to protect the production of birdseed, which is used to help bird population.

I buy 1 to 2 tons of birdseed a year and have published papers on studies done on bird populations that utilized data of the feeder populations. I direct student research projects that use birdseed. If this program is ever approved, I will do everything possible to create a boycott of products from N or S Dakota. (Individual, No Address - #B3-2.2.60100.906)

183. Public Concern: APHIS/Wildlife Services should determine whether pesticides will remain in sunflower products.**DUE TO THE PERCEIVED THREAT TO HUMAN HEALTH**

I am a person who uses sunflower oil in cooking and I am concerned that my oil may be tainted with small amounts of poison. This would cause me to avoid using that type of oil. (Individual, Duluth, MN - #B3-407.7.60100.906)

If by supporting the National Sunflower Association, I am poisoning fellow sunflower seed-eaters, I will gladly switch to pumpkin seeds or peanuts! (Individual, No Address - #B3-483.1.60100.906)

Social Values

Social Values General

184. Public Concern: APHIS/Wildlife Services should consider the value of red-winged blackbirds to the quality of human life.

You should be ashamed of yourselves and the agency you work for. What kind of life are you leaving for our grandchildren and future generations to come? You obviously have no respect for life and the other beings on Earth. You are not the only species alive . . . you do not own our world. Rethink your proposal and stop the slaughter of these animals and wildlife . . . you might be able to live a healthy and happy life, otherwise I believe what goes around comes around. Have a nice life . . . (Individual, No Address - #B3-186.2.70100.704)

If you have ever lived in a northern climate and have heard the red-winged blackbird's call in the spring you would appreciate this harbinger of spring, and the joy it brings. (Individual, Duluth, MN - #B3-406.9.70520.702)

Our children need to enjoy the wonders of nature—how can they when people who take it upon themselves to destroy wildlife—because they are becoming a nuisance to them—you need to think about this again—please don't jeopardize the future any more than it is—our children deserve the same way of life as you did when you were young. (Individual, No Address - #B3-472.2.70510.704)

I am concerned about my and other American's ability to enjoy blackbirds and other migratory birds that this proposal may impact. I have always enjoyed the first sound of the blackbird song in marshes and other wetlands as spring approaches. With the ever increasing loss of wetlands due to development and poor monitoring of wetland mitigation/banking (ACOE program), there are fewer and fewer opportunities for me to enjoy this spring ritual. (Individual, Omaha, NE - #B3-392.7.80120.400)

As a bird watcher (and listener) I look forward to the sound of the blackbirds every spring. The thought of a silent spring is just horrible to me.

Perhaps the plan isn't going to happen in my little area of North Dakota, but that doesn't mean that people where it is happening will feel differently from me. (Business, Clifford, ND - #B3-334.2.25300.705)

185. Public Concern: APHIS/Wildlife Services should recognize the intrinsic value of red-winged blackbirds.

Has the Department of Agriculture decided these birds have no right to even the smallest amount of food, as opposed to farmers' profits? If the Department of Agriculture takes this step, it will affect more than just the redwing blackbird population. As a part of the food chain, these creatures have a right,

indeed a moral imperative to exist. Every time man has interfered in the food chain, it has been a catastrophe. I remind you of the rabbits brought in to Australia. When will this end? Will this government continue to play with our land without even having the slightest concept of the eventual results? (Individual, Rio Rancho, NM - #B3-637.1.25300.920)

With all of the problems in the world today with how human life is treated, and by extension, all forms of life, I urge the U.S. Department of Agriculture to set a better, more compassionate tone—one that demonstrates the value that all life is precious, equal, and deserving of honor. (Individual, No Address - #B3-546.2.70200.702)

186. Public Concern: APHIS/Wildlife Services should adhere to humane principles in its efforts to control red-wing blackbird populations.

I am constantly dismayed with the USDA, and their general lack of knowledge and lack of concern with adhering to humane principles. (Individual, Cave Creek, AZ - #B1-18.2.11000.103)

The plan to poison red-winged blackbirds, yellow-headed blackbirds, and common gackles in South Dakota to protect sunflower crops:

This plan is inhumane, anachronistic, and arrogant on the part of APHIS personnel and farmers. You will kill your target species and other species as well. Have you learned nothing from the decades during which you set poison for predators such as the coyote? You wiped out nearly every living animal in vast areas of the U.S. west.

You are the public servants of citizens other than sunflower-seed farmers. We do not want these birds poisoned. The farmers can charge more for the seeds that they DO harvest if the quantity of seeds harvested is decreased. (Individual, Corrales, NM - #B3-644.1.25300.920)

I urge USDA to abandon this unnecessarily cruel plan and the U.S. Fish and Wildlife Services to refuse to grant the USDA a permit. (Individual, Redwood City, CA - #B1-61.3.11130.100)

As a serious reminder, God created everything, including the red-winged blackbirds. These creatures are one of God's most beautiful creations on earth. We should not commit horrific nor sadistic acts against living creatures. (Individual, Montreal, Canada, - #B3-130.2.70200.417)

Adequacy of Analysis

187. Public Concern: APHIS/Wildlife Services should analyze the social effects of its proposed action.

I would like to see the impacts evaluated that are related to the social and quality of life changes associated with the control of blackbirds or the alternatives. (Individual, Crystal, MN - #B3-14.2.70100.417)

188. Public Concern: APHIS/Wildlife Services should analyze the effects of red-winged blackbird control methods on local communities.

I would like to see survey tools to evaluate environmental impacts that have social and community consequences. I would like to know how the blackbird control methods affect tourism and the attractiveness of the area to visitors and residents. (Individual, Crystal, MN - #B3-14.7.70100.920)

Economic Values

Economic Values General

189. Public Concern: APHIS/Wildlife Services should recognize that killing red-winged blackbirds will ultimately lead to lower market prices for sunflower seeds.

BECAUSE BIRD FEEDERS WILL PURCHASE LESS SEED

Millions of Americans purchase multimillion of pounds of oilseeds annually to winterfeed the songbirds, including blackbirds. If you were to control blackbird "damage" by killing them, you would increase sunflower supply and reduce sunflower seed demand at backyard feeders. This would negatively impact sunflower seed market prices. If, however, you freely feed blackbirds during their breeding period, their numbers and winter consumption at backyard feeders would increase, resulting in upward pressure on prices. (Individual, Burton, OH - #B3-116.1.90400.900)

190. Public Concern: APHIS/Wildlife Services should implement Alternative 3.

BECAUSE KILLING MILLIONS OF BIRDS IS A WASTE OF TAXPAYER DOLLARS

The killing of millions of blackbirds by Wildlife Services is a waste of taxpayer dollars. Audubon supports the alternative of "no involvement by Wildlife Services in sunflower protection." Wildlife Services (perhaps they should change their name to Wildlife DISservices) cannot justify the poisoning of millions of blackbirds on economic or scientific grounds. (Preservation/Conservation Organization, Saltsburg, PA - #B3-66.7.20130.913)

191. Public Concern: APHIS/Wildlife Services should support legislation to offer tax credits to sunflower growers that use methods which have the least ecological effects.

TO ENCOURAGE ENVIRONMENTALLY CONSCIOUS DECISIONS

"Green" sunflower farmers and those who purchase and use "green" sunflower oil, ("green" meaning grown with minimal ecological impact such as no poisoning of red-winged blackbirds), could receive either or both a tax credit and special seal of approval that would officially classify them as "green" and then the consumers with an ecological conscience could buy their products, willing to pay the extra costs. (Individual, Oakton, VA - #B3-140.3.20200.900)

192. Public Concern: APHIS/Wildlife Services should not subsidize sunflower growers.

Overall loss of sunflower seeds is small though concentrated. You report the overall loss of sunflowers to red-winged blackbirds each year equals approximately 1-2 percent of the entire crop. In my view, this exceedingly small loss does not warrant attention from federal agencies. Expending citizens' tax dollars on such a small problem appears to me an unwarranted public subsidy of private business, especially when it involves the death of innocent animals who are merely following their evolutionary instincts to remain alive. In my view, the loss should be considered the price of doing business. (Individual, Saint Paul, MN - #B1-119.1.90500.906)

Adequacy of Analysis

Adequacy of Analysis General

193. Public Concern: APHIS/Wildlife Services should provide an adequate economic analysis.

Section E indicates that the goal of the WS blackbird damage management program is to reduce the level of damage to sunflower crops in ND/SD to no more than 5% in individual sunflower fields. What is the 5% or less crop damage goal based upon? How was this figure arrived at—if the damage by blackbirds was not reduced, and damage by insects was reduced to 3%, weeds 3%, and diseases to 4%, how would this affect profits? What is the current average annual net profit for the sunflower growers? (Individual, Omaha, NE - #B3-392.3.90100.912)

BY CONSIDERING THE DEPARTMENT OF INTERIOR'S REVIEW OF THE ECONOMIC ANALYSIS OF SPRING BAITING PRESENTED BY PEER ET AL

An economist with the Department of the Interior has reviewed the economic analysis of spring baiting presented by Peer et al. (2000). This review is enclosed and the comments should be considered in the development of the economic evaluation. (United States Fish and Wildlife Service, Denver, CO - #B3-461.16.90100.912)

1. How much is currently spent on damage management by all parties? Is a detailed analysis of the costs, both public and private available?
2. How much does it cost to operate the cattail management program? What are the cattail management program costs specifically with regard to glyphosate?
3. How much does it cost to operate the aerial hazing program?
4. How much of sunflower production from North Dakota and South Dakota is ultimately for sale in commercial markets as birdseed? To consider that there are programs already in place, and drastic new ones proposed, for the control of wild birds that damage commercial sunflower crops grown for the purpose of supplying commercial birdseed, is madness on a grand scale.
5. Exactly how much money has been spent by individual sunflower growers, organizations representing sunflower growers, and others who benefit economically from sunflower production, for all damage control programs? In contrast, how much has the U.S. government spent? (Individual, No Address - #B3-142.18.90100.912)

BY CALCULATING ALL COSTS ASSOCIATED WITH A RED-WINGED BLACKBIRD CONTROL PLAN

A significant omission in the scoping document is the dollar cost of the extensive efforts involved in the blackbird-poisoning and cattail-eradication efforts, both past and proposed. These costs must be in the tens of millions of dollars, whereas the total estimated crop damage is a mere \$4-7 million dollars annually. Why are we given information about economic loss, but no information about the economic expense being proposed to stop the economic loss? It is not possible to analyze this proposal logically from an economic standpoint because only part of the information has been provided.

The EIS should provide honest numbers for both sides of the equation.

From the information provided in the Scoping Document, "Reducing Damage Caused by Blackbirds to Commercial Sunflower Crops in North Dakota and South Dakota," the following economic costs—at a minimum—are involved:

1. Six reasons projects currently being conducted by the National Wildlife Research Center.
2. Two proposed research projects.
3. Other studies that were not identified.
4. The cost of avian pesticides and equipment.
5. The cost of herbicides to kill the cattails and equipment.
6. The cost of hazing and related equipment.

7. The administrative and personnel costs of the myriad federal and state agencies, private industry organizations, and state universities involved in studying this issue, including USDA-APHIS-Wildlife Services, USFWS, the National Wildlife Research Center, the North Dakota Department of Agriculture, the South Dakota Department of Agriculture, the North Dakota Game and Fish Department, the South Dakota Game, Fish and Parks, the National Sunflower Association, South Dakota State University and North Dakota State University, North Dakota Crop Protection Product Harmonization and Registration Board, and the South Dakota Oilseed Council.

There has not even been an attempt to quantify the expenses of the above items, even though blackbird poisoning and cattail eradication have been undertaken in previous years and actual costs are known.

The scoping document only focuses on the economic loss to farmers. It does not offer information on or invite comment about the expense to stop that economic loss. The proposed EIS thus seems slanted toward ignoring the expense side of the issue, while focusing just on the economic harm side of the issue. We feel that approach would be invalid and scientifically unsound. We urge APHIS to study all economic aspects of all proposed alternatives. (Preservation/Conservation Organization, Saint Louis, MO - #B3-376.22.90100.912)

BY UPDATING THE SUNFLOWER CROP VALUE FIGURES TO INCLUDE THE YEAR 2000

The South Dakota Department of Game, Fish and Parks recommended that the sunflower crop value figures be updated to include the year 2000. (South Dakota Department of Game, Fish, and Wildlife, Pierre, SD - #B2-3.4.90100.912)

Cost Benefit Analysis

194. Public Concern: APHIS/Wildlife Services should provide an in depth cost benefit analysis.

Cost benefit analysis versus the likelihood of success issues all need to be addressed in the NEPA documents. (Individual, Sioux Falls, SD - #B1-30.8.90500.100)

When addressing economics, the document would benefit from a discussion of the practicality of killing the number of birds necessary to reduce damage. This economic discussion should focus on cost benefits to the producers who actually experience excessive damage (i.e., greater the five or 10 percent) vs. modeling economic benefits over the entire sunflower producing area, since damage is not spread out over the entire growing area neither is it experienced by all growers. Costs of all spring baiting research should be included in the calculation of operational costs. (United States Fish and Wildlife Service, Denver, CO - #B1-161.7.90500.903)

My concern stems from the fact that I have not seen sufficient evidence to demonstrate that the benefits outweigh the costs or that the loss associated with blackbirds has a significant impact. According to the numbers in section B.2, insects, disease, and even weeds have much greater impacts, and it seems like these factors could be more effectively controlled or reduced with fewer environmental impacts and greater long-term control. (Individual, Crystal, MN - #B3-14.1.90100.920)

BECAUSE OF THE USE OF PUBLIC FUNDS

This program affects me because I am a tax-paying citizen that is funding this. I feel this program needs to prove that it is the best alternative in terms of cost, benefit, and low-impacts. (Individual, Crystal, MN - #B3-14.3.90500.913)

Wildlife Services has not provided a cost/benefit ratio for the blackbird poisoning program. Are the American taxpayers getting a fair return on their investment in the sunflower crop protection? Gannet News Service on April 19 outlined the cost of just some of the programs that are involved with the blackbird poisoning effort. Those programs alone ran into the hundreds of thousands of dollars. Is the poisoning effort costing as much or more than the value of the crops protected? (Preservation/Conservation Organization, Saltsburg, PA - #B3-66.3.90500.913)

WITH RESPECT TO USE OF DRC-1339

The economics of the DRC-1339 blackbird control program need to be evaluated and weighed against putting the same funds into more effective non-lethal controls and/or a compensation or insurance fund. The new scoping document substantiates that overall bird consumption of sunflower seed still is in the range of 1-2 percent of the total crop. ABC [American Bird Conservancy] realizes that bird damage to crops may be concentrated and individual growers can experience much higher rates of depredation. Such a transfer in funds from a program of DRC-1339 spring and fall rice baiting of blackbirds that has proven to be ineffective to funding better non-lethal controls and compensation/insurance should be carefully analyzed in the EIS. (Preservation/Conservation Organization, Washington, DC - #B3-298.14.90100.909)

WITH RESPECT TO INCOME LOSS TO GROWERS AND TO NORTH DAKOTA

The EIS should include an in-depth damage study in terms of income loss to producers and to North Dakota as part of its proposed cost-effectiveness analysis outlined in subletter "m" of Issues Proposed for Detailed Consideration in the EIS. (Agriculture Association, Jamestown, ND - #B3-270.6.90100.912)

Local Economies

195. Public Concern: APHIS/Wildlife Services should consider the economic effects of red-winged blackbird damage on sunflower growers.

We are compelled to find an answer because in this agriculture dependent state, blackbirds have a real economic impact on our producers. Although losses are difficult to quantify, the South Dakota State Department of Agriculture has estimated that blackbird depredation causes producers to lose up to 30 percent of their yield. Using a historical net yield of \$30 per acre for sunflowers, then blackbirds cost an affected producer an average loss of \$8 an acre. Using U. S. Department of Agriculture figures, in South Dakota producers planted 337,000 acres in the North Central, North East and East Central Districts of South Dakota. While blackbirds exist in other parts of the state, it is within those districts that they are the most prevalent annually would be just under \$2.7 million dollars. More importantly, however, is that those averages do not begin to calculate the devastation for those producers along the migration path who have 40 percent or more of their crop by blackbirds. (Agriculture Association, Pierre, SD - #B1-84.4.90300.902)

This year we had to hire a crop sprayer to "buzz" the birds from the fields. That cost was about \$500. We continue to use rifles, shotguns and other devices to move the birds. I would estimate that 25 to 30 acres of our production sustained a 900-pound loss per acres due to the blackbirds. We had a good year growing sunflower as the average yield was 1800 pounds per acre, however, a 900 pound loss over 25 acres is 22,500 pounds per multiplied by 0.1068 (average price and LDP) equates to \$2400 loss. I would estimate that the blackbird reduced our net profit by \$6.50 per acre (\$3,000 / 460 acres). (Business, Coleharbor, ND - #B3-640.3.90300.903)

As a sunflower breeder for Seeds 2000, a regional developer of sunflower hybrid for the upper Midwest and great plains area of the U.S., I am in constant contact with farmers especially in North and South Dakota who are experiencing serious and significant losses in their sunflower production and livelihood due to blackbird damage. I frequently hear farmer's complaints of losses ranging from 10 to 50 percent yield losses and higher. Some farmers say they will be forced to quit growing sunflower if measures are not taken to control blackbird numbers. This would be a substantial loss of income for them because sunflower is a significant source of income for farmers in the drier areas of the Dakota where fewer options of crops that can be successfully grown exist. If fewer farmers grow sunflower this would certainly have a serious impact on our business as well. (Business, Breckenridge, MN - #B3-573.1.90300.906)

As the owners and proprietors of a backyard bird-feeding specialty retail store we are also concerned with the possibility of having customers think we are selling sunflower seed to feed birds in Indiana while millions of blackbirds are being poisoned to be able to grow the sunflowers in the Dakotas. (Business, Bloomington, IN - #B3-26.2.90320.903)

AND ON RURAL ECONOMIES

Sunflower production is important to the economic viability of South Dakota farmers and rural economy. During 1999, South Dakota farmers harvested nearly 900,000 acres of sunflowers with a total value of nearly 100 million dollars. While the overall impact of blackbirds is relatively low, 1-2 percent, the dollar amount is still significant. However, these losses tend to be localized which can be devastating for individual farmers. Further, the ability of our farmers to incorporate sunflowers into their crop rotations is invaluable. (South Dakota Department of Agriculture, Pierre, SD - #B1-185.1.90400.903)

Appendix A

Demographic analysis presents an overall picture of respondents: where they live, their general affiliation to various organizations or government agencies, and the manner in which they respond. The database CAT uses contains public comment organized under subject categories and demographic information. This kind of database can be used to isolate specific combinations of information about public comment. For example, a report can show public comment from certain geographic locations or show comments associated with certain types of organizations. Thus demographic coding, combined with comment coding, allows managers to use the database to focus on specific areas of public concern linked to geographic area, organizational affiliation, and response format.

The total number of responses is as follows:

- | | |
|-----|------------------------------|
| 698 | original responses |
| 279 | organized campaign responses |
| 977 | total responses |

The demographic analysis presented in this appendix is based on all 977 responses.

It is important to recognize that the consideration of public comment is not a vote-counting process in which the outcome is determined by the majority opinion. Relative depth of feeling and interest among the public can serve to provide a general context for decision-making. However, it is the appropriateness, specificity, and factual accuracy of comment content that serves to provide the basis for modifications to planning documents and decisions. Further, because respondents are self-selected, they do not constitute a random or representative public sample. The National Environmental Policy Act (NEPA) encourages all interested parties to submit comment as often as they wish regardless of age, citizenship, or eligibility to vote. Respondents may therefore include businesses, people from other countries, children, and people who submit multiple responses. Therefore, caution should be used when interpreting the numbers provided in this report. While demographic information can provide insight into the perspectives and values of respondents, it does not necessarily reveal the desires of society as a whole. All input is considered and the analysis team attempts to capture all relevant public concerns in the analysis process.

CAT identifies several categories for demographic purposes. Responses are the individual letters, postcards, emails, etc., received. Respondents are the individual response writers. Signatures refer to the people who signed these individual responses. The number of signatures may be greater than the number of responses as there may be more than one signature per response. Likewise, the number of total responses may be larger than the number of total respondents due to multiple submissions by the same respondents. CAT determines the number of responses received for a given project, the number of respondents, and the number of signatures.

Geographic Representation

Geographic representation is tracked for each response. Table 1 displays, by origin, the number of responses and signatures. Responses were received from 49 states. Note that 224 responses did not indicate geographic information.

Table A-1. Number of Responses and Signatures by Origin

State	Number of Responses	Number of Signatures
Alabama	2	2
Alaska	1	1
Arizona	11	15
Arkansas	2	2
California	53	66
Colorado	13	13
Connecticut	9	9
Delaware	2	3
District of Columbia	7	7
Federated States of Micronesia	0	0
Florida	22	25
Georgia	7	8
Guam	0	0
Hawaii	0	0
Idaho	1	1
Illinois	24	25
Indiana	8	9
Iowa	4	4
Kansas	5	5
Kentucky	4	4
Louisiana	1	1
Maine	4	4
Maryland	19	19
Massachusetts	13	14
Michigan	17	17
Minnesota	46	50
Mississippi	0	0
Missouri	17	17
Montana	1	1
Nebraska	1	1
Nevada	1	1
New Hampshire	4	4
New Jersey	26	52
New Mexico	9	9
New York	51	52

North Carolina	12	13
North Dakota	109	111
Ohio	19	19
Oklahoma	1	1
Oregon	9	11
Pennsylvania	38	39
Puerto Rico	1	1
Rhode Island	1	1
South Carolina	4	4
South Dakota	37	38
Tennessee	6	6
Texas	30	31
Utah	3	3
Vermont	2	2
Virginia	13	13
Washington	14	15
West Virginia	1	1
Wisconsin	43	46
Wyoming	0	0
International	20	21
Response submitted by Multiple States	5	191
Anonymous/Unknown	224	240
Total	977	1248

Organizational Affiliation

Organizational affiliation is tracked for each response. Table 2 displays, by organization type, the number of responses and signatures. The first box indicates respondents who wrote on behalf of themselves or those whose affiliation was unclear.

Table A-2. Number of Responses and Signatures by Organization Type

Organization Type	Number of Responses	Number of Signatures
Individual/Unaffiliated	807	883
University/Professional Society	0	0
Federal Agency/Elected Official	3	3
State Agency/Elected Official	5	6
County Agency/Elected Official	0	0
Town/Municipality Agency/Elected Official	0	0
International Government/Association	1	1
Government Employees, Organizations and Unions	1	1
Tribal Official/Member	0	0
Agriculture Industry/Association	4	4
Conservation District	0	0
Business	124	127
Place Based Group	3	3
Civic Group	0	0
Range/Grazing Organization	0	0
Timber or Wood Products Industry/Association	0	0
Mining Industry/Association	0	0
Oil and Pipeline Industries	0	0
Recreational Non-Motorized Organization	0	0
Recreational Motorized Organization	0	0
Special Use Permittee	0	0
Conservation/Preservation Organization	23	23
Utility Group/Organization	1	1
Multiple Use, Wise Use, Land Rights Organization	0	0
Other	0	0
Single Responses signed by Multiple Organizations	5	196
Total	977	1248

Response Type

CAT also tracks response format. The public uses a variety of response formats including letters, faxes, emails, public meeting transcripts, resolutions, action alerts, and organized response campaign letters. Tracking response format allows better preparation for what future projects may bring in terms of number of responses, human resource needs, and future computer system needs. For example, the recent switch to electronic communication has brought with it the need for augmentation of computer systems, a trend that is well documented in the demographics from previous projects. Thus the inclusion of response format in demographic analysis allows managers to better serve the public by anticipating needed resources.

Table 3 displays, by response format, the number of responses and signatures. The majority of responses received were email, followed by letters and faxes.

Table A-3. Number of Responses and Signatures by Response Format

Response Format	Number of Responses	Number of Signatures
Letter	384	582
Email	586	659
Fax	7	7
Public meeting comment form	0	0
Public meeting transcript	0	0
Resolution	0	0
Action alert	0	0
Public meeting notes	0	0
Workshops	0	0
Telephone transcript	0	0
Total	977	1248

Appendix B

Public Concern List

Introduction

Public Concerns are derived directly from public comment. Each represents the gist of a statement of concern made by the public. Concerns may be derived from one person's input, but often represent the view of many respondents. They are intended to aid the planning team in characterizing the issues to be analyzed in subsequent stages of the planning process. They may also provide a framework for preparing responses to public comment. Primarily, public concerns serve to guide readers to public comment on specific topics. As such, this index is intended to be used as a cross reference to public concerns listed in chapters 1 through 5 of the Summary of Public Comment. Readers may identify their areas of concern within the list provided in this index and then reference the relevant portion of the summary document. There they will find sample quotes in support of the concern statement. Each sample quote includes a letter number reference should users wish to look at the original letter.

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